

Form Reference	AE Template - Code of Conduct Acknowledgement Form
Approved By	Cynthia Payne (Managing Director)
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Purpose and Aim

The purpose of the Code is to create expectations of a foundational behaviour that all consumers can expect from their providers, aged care workers and governing persons, place obligations relating to behaviour on individuals, thereby giving the Aged Care Quality and Safety Commission (the Commission) a mechanism by which to respond to behaviour that falls below what is expected by the Code and to directly engage with aged care workers and governing persons about their conduct.

The Code is aimed at ensuring that all consumers can have confidence in the quality of aged care and can expect the same level of high quality and safe care regardless of who provides their aged care services.

The Anchor Excellence Code of Conduct will also assist Employees and Contractors to understand the expectations around personal behaviour and communication.

This Anchor Excellence Code of Conduct applies to all Anchor Excellence team members. Duties are predominantly derived from position descriptions, contractor agreements or client assignments, accordingly:

1. All AE Team members must act honestly, in good faith and in the best interest of Anchor Excellence as a whole.
2. All AE Team members have a duty to use due care and diligence in fulfilling the commitment of client assignments.
3. All AE Team members must comply with the accountabilities assigned to their respective roles.
4. All AE Team members must not make improper use of information acquired as an AE Team employee or contractor.
5. ALL AE team members must not accept financial inducement or gifts outside of contractual terms.
6. All AE Team members must not take improper advantage of the position as an AE Team employee or contractor.
7. All AE team members must treat information about clients and their customers with complete confidentiality and comply with the AE Privacy Policy
8. All AE Team members must not allow personal interests, or the interests of any associated person, to conflict with the interests of Anchor Excellence or Anchor Excellence clients.
9. All AE Team members have an obligation to be independent in judgment and actions and to take all reasonable steps to discharge client assignments per their documented intentions.
10. All AE team members, when on-site and in virtual meetings with clients, include business-style dress. Wearing of the AE name badge and verification where needed for flu vaccination, covid vaccination or police check records

11. Confidential information received as an AE Team member in the course of the exercise of AE Team member duties remains the property of Anchor Excellence and it is improper to disclose it or allow it to be disclosed unless that disclosure has been authorised by Anchor Excellence, or the person from whom the information is provided, or is required by law.
12. All AE Team members should not engage in conduct likely to bring discredit upon Anchor Excellence.
13. All AE Team members have an obligation, at all times, to comply with the spirit, as well as the letter of the law and with the principles of this Code.
14. All AE Team members have an obligation to align behaviours against the Anchor Excellence values:
 - a. Authentic - we are genuine and always reflect our true selves
 - b. Nimble - we move quickly to meet our client's needs
 - c. Collaborative - we work collaboratively with our clients and stakeholders
 - d. Honest - we are sincere and truthful in all that we do
 - e. Outcomes - we focus forwards and towards the achievement of goals and objectives
 - f. Responsive - we are there for our clients when they need us.

Guidelines for the interpretation of principles

The following Guidelines are intended to assist Anchor Excellence team members in complying with the core principles of the Code. They are not meant to be exhaustive and may be added over time to address issues of importance as they arise.

- **Duties to Anchor Excellence**

1. Each AE Team member should endeavour to ensure that the tasks in the accountability matrix are properly understood and are competently discharged in the interests of Anchor Excellence.
2. All AE Team members should endeavour to ensure that assigned tasks or deliverables to the best of their abilities.
3. In evaluating the interests of Anchor Excellence all AE Team members should consider the interests of Anchor Excellence as a whole, but where appropriate and/or required by law should consider the interests of others.
4. Each AE Team member should endeavour to ensure that Anchor Excellence is financially viable, properly managed and constantly improved so as to protect and enhance the interests of Anchor Excellence.
5. Where conflict or issues arise that could affect the reputation or execution of client assignments, all AE team members will communicate or escalate these matters in Team meetings or directly to the COO or CEO.

- **Duties to Clients**

1. AE Leads are accountable to ensure that client work plans arising from client agreements are delivered. We are obliged to serve in the best interests of the client. If barriers arise with clients then AE leads must document a risk escalation report to the client. Unresolved escalations must be escalated to the CEO for further action.

2. All AE team members must escalate and report client feedback, especially complaints and draw these to the attention of the COO or CEO for action and resolution
3. When we are assigned to work as appointed 'Adviser' for services with severe non-compliance, We note these appointments have special meaning under the Aged Care Act 1997 and we are also obliged to meet Key personnel requirements and work to address the primary need of care and services to older consumers who reside at the service.

- **Due Diligence**

1. All AE Team members should attend all Anchor Excellence meetings but where attendance at meetings is not possible to appropriate steps should be taken to across key actions and decisions. Note the expectation of using the Trello platform for individual and group-assigned tasks
2. All AE Team members must acquire knowledge about the business of Anchor Excellence, the statutory and regulatory requirements affecting Employees or Contractors in the discharge of their duties to Anchor Excellence and be aware of the physical, political and social environment in which it operates
3. All AE Team members should endeavour to ensure that systems are established with Anchor Excellence to provide the CEO, on a regular and timely basis, with necessary data to enable them to make a reasoned judgment and so discharge their duties of care and diligence. An internal audit of systems supporting Anchor Excellence should be conducted regularly.
4. All AE Team members should endeavour to ensure that relations between Anchor Excellence and the external accountant and bookkeeper are open, unimpeded and constructive.
5. All AE Team members shall endeavour to ensure Anchor Excellence complies with the law and strives for the highest standards of business and ethical conduct.

- **Use of Information**

1. All AE Team members must not make improper use of information acquired by virtue of their position as an AE Team member. This prohibition applies irrespective of whether the AE Team member would gain directly or indirectly a personal advantage or an advantage for any associated person or might cause detriment to Anchor Excellence.
2. Matters such as trade secrets, processes, methods, advertising or promotional programs, sales and statistics affecting financial results are particularly sensitive and must not be disclosed.

- **Professional Integrity**

The Anchor Excellence CEO is responsible for establishing a system for identifying and disclosing managing conflicts of interest across Anchor Excellence and monitoring compliance with this Code. Each person to whom this code applies is responsible for complying with those systems and standards.

Breaches of the Code of Conduct

If the Anchor Excellence team member has a reason to believe that a person subject to this Code of Conduct has failed to comply with it, the CEO will investigate the circumstances.

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The AE Team member will be stood down, pending investigation, due to allegations that individual employee or contractor conduct has been detrimental to the interests of Anchor Excellence.

All reports of breaches by an AE Team member should be reported to the CEO in the first instance, outcomes from investigations are not subject to review. The CEO's decisions are final.

Review Process

This Code of Conduct will be reviewed at least every five (5) years or as needed to ensure that the Code of Conduct is operating effectively.

Related Documents

- Anchor Excellence Accountability matrix
- Employment or Contractor agreements
- Anchor Excellence Strategy- Vision, Purpose and Values

The Aged Care Code of Conduct also applies to all Anchor Excellence team members. We ensure - *When providing care, support and services to people, I must:*

1. Act with respect for people's rights to freedom of expression, self-determination and decision-making in accordance with applicable laws and conventions;
2. Act in a way that treats people with dignity and respect, and values their diversity;
3. Act with respect for the privacy of people;
4. Provide care, supports and services in a safe and competent manner, with care and skill;
5. Act with integrity, honesty and transparency;
6. Promptly take steps to raise and act on concerns about matters that may impact the quality and safety of care, supports and services;
7. Provide care, supports and services free from
 - a. All forms of violence, discrimination, exploitation, neglect and abuse; and
 - b. Sexual misconduct; and
8. Take all reasonable steps to prevent and respond to
 - a. All forms of violence, discrimination, exploitation, neglect and abuse; and
 - b. Sexual misconduct.

[Aged Care Code of Conduct \(The Code\) 2022.](#)