

FOSTERING HUMANITY, HOPE AND DIGNITY FOR DISPLACED PEOPLE



CODE OF
CONDUCT





HOST is an organisation that values integrity, respect, diversity, innovation and compassion in our work with communities and each other. We want these values to be core in the stories that people tell about us and to frame how we are remembered. We have a Code of Conduct to help set out the expectations that we have of our staff and to help guide the application of our values in practice.

In seeking to make life better for displaced people, we expect to be working as guests in communities and with vulnerable people. We may also be living and working in the same community as our clients. We must therefore be careful to ensure that we do no harm, remain above reproach and operate with professional ethics. We must also work extra hard to maintain professional boundaries whilst retaining high levels of trust within the community.

We have chosen not to achieve this with a code that is full of rules as it would be impossible to cover every possible situation that our staff may find themselves in. Instead the code is based around a mix of rules and principles that will aim to assist staff to make appropriate decisions and to understand our expectations. A range of policies and procedures will be developed and maintained that will provide further guidance and support in implementing the principles in the code.

Please work together to understand the code and to keep each other accountable to it.





Purpose

HOST International (HOST) is committed to fostering humanity, hope and dignity for displaced people. To do this effectively our work must be embedded in our values and reflect our unique approach. In particular, we must operate with integrity and credibility in all aspects of our work so that we can maintain the trust of those we work with.

The Code of Conduct ('the Code') is designed to set out our expectations of HOST staff and:

- to establish and preserve credibility with the public;
- the people we serve; and
- within our own organisation.

It also aims to outline behaviour that will ensure the safety and wellbeing of those we work with and that our values are delivered in practice at all times.

The Code should be read in conjunction with The Way We Work employee handbook that sets out our vision, values and practice approach. It is also supported by additional policies and procedures which further outline how we expect staff to approach or behave in certain situations.

The Code shall be used by all HOST staff to guide and inform decisions regarding their interactions with individuals, communities and others.

HOST Values

HOST is committed to delivering services that foster humanity, hope and dignity for all and that are underpinned by the following values:

- Respect - we listen and take time to understand and build trust
- Compassion - we practice patience, understanding and forgiveness
- Innovation - we ask "what is possible?" and learn from our mistakes
- Integrity - we do as we say and welcome transparency
- Diversity - we welcome and value difference

We are also committed to the principle of 'do no harm' by ensuring that our actions do not cause harm to individuals, communities or stakeholders. We are particularly committed to ensuring the safety and wellbeing of children and other vulnerable individuals.

We expect our staff, at all times, to act fairly, in good faith and without bias or prejudice. This includes an expectation that all eligible people, communities and organisations are informed about, and have access to HOST services regardless of factors such as race, colour, gender, sexual orientation, age, religion, national origin, marital status or other conditions or status.

Staff are expected to be aware of their personal limitations, values and needs, and ensure that these do not:

- impact on the fulfilment of the organisation's vision, mission and primary purposes;
- isolate or intimidate colleagues, clients (including children, young people, vulnerable people), volunteers;
- affect the development and maintenance of appropriate professional boundaries with clients (including children, young people, vulnerable people); or
- interfere with prompt and effective decision-making or conflict resolution processes. ☺

Application

This Code applies to all staff employed or engaged by HOST and involved in the delivery of HOST services. For FIFO/Expatriate staff, this also applies to behaviour during and outside of shift/work hours as these employees are considered to represent HOST during the entire period of their deployment.

Expectations & Responsibilities

All staff

All staff are responsible for understanding and implementing the Code in a way that brings honour and integrity to HOST. This includes peer accountability by raising concerns with each other and leading by example. If a part of the Code is not understood or there is disagreement, this should be discussed with a relevant Supervisor/Manager or member of the Human Resources team as soon as practicable.

During the course of employment, all staff have a responsibility to promptly raise any concerns they have where a colleague, or themselves, is not adhering to the Code or where they are unsure about its application. All staff are expected to report any suspected or actual breaches of this Code to their Supervisor/Manager or to Human Resources.

Supervisors and Managers

Supervisors/Managers have a responsibility to lead by example and support staff to reflect on and ensure application of the Code in all aspects of their work. This includes coaching staff on behaviour that is risky or likely to lead to a breach and leading regular discussions about the Code in team meetings.

Updates and Approval

The Code must remain consistent with HOST values and vision and will be reviewed annually by the Senior Management Team. The Chief Executive Officer (CEO) will be responsible for ensuring the Code remains relevant and will approve any changes as required.

Breaches of the Code of Conduct

Alleged breaches of the Code are to be reported to Human Resources, and your immediate Supervisor/Manager. Breaches which are deemed as serious may result in disciplinary action up to and including dismissal and/or referral to external investigation bodies.

Staff working in other countries may also be subject to visa termination by the governing authorities. Cancellation of a visa will lead to termination of that employee's employment with HOST.

The Code provides guidance on many of the ethical and compliance issues you might face working with HOST. In addition to reading the Code, you should consult our policies and procedures, for more detailed information.

Complaints or concerns regarding behaviour will be investigated promptly and in accordance with the *HOST Grievance Policy*.

How will the Code be implemented?

All staff will be made aware of the Code at the point of engagement and must agree to the terms set out in the Code prior to commencing employment. Failure to agree and comply may void any employment offer.

Staff with the responsibility for supervising and/or managing other staff have an additional responsibility to monitor application of the Code and to manage any potential or actual breaches of the Code.

How do I Raise a Concern?

If you feel that the Code or associated policies are not being upheld, you have a duty to speak up. HOST understands that reporting a concern may make staff uncomfortable, however by speaking up HOST can investigate the matter to ensure that our people are living our values.

HOST does not condone any retaliation or victimisation against staff who report a concern. Where there is evidence of retaliation such as bullying, threats or other intimidating behaviour, HOST will commence an investigation into this matter. Any retaliation against a staff member or community member for raising a concern will be handled as a disciplinary matter with zero tolerance as detailed within the *HOST Whistleblowing Policy*.

Concerns can be raised by informing any of the following staff/departments:

- Your Supervisor/Manager;
- A member of the Human Resources team;
- A member of the Integrity and Performance team; or
- Via either the feedback@hostinternational.org.au or complaints@hostinternational.org.au email addresses

All reports of concern will be treated confidentially. Further guidance is available in the *HOST Grievance Policy* and the *HOST Complaints & Grievance Procedure*. 



Our vision is for our people to be highly engaged and proud to be working with HOST, to make life better for displaced people and their host communities. To achieve this, we need to demonstrate and practice our values and create safe, effective work environments where our staff enjoy coming to work.

Our Values in Action

The values of respect and compassion dictate that we treat each other as we expect to be treated and show patience and understanding when situations don't go to plan, or situations occur outside of anyone's control. The value of diversity means we take time to understand what each person brings to the work place that, put together, make us better.

The value of integrity means that we are authentic, transparent and honest with each other and do not abuse or neglect our responsibilities.

Finally, our value of innovation means that we look for ways to create new possibilities, improve workplace efficiencies and support others in taking measured risks.

Workplace Harassment, Discrimination & Bullying

Harassment, discrimination and bullying aren't just illegal; they lower morale and create an atmosphere of mistrust and disrespect that prevents us from reaching our full potential. By preventing harassment, bullying and discrimination, we aim to achieve a work environment where staff feel safe and empowered.

The HOST workplace must be respectful and free from harassment, discrimination and bullying.

This means that we:

- always treat each other with dignity, courtesy and respect;
- never make anyone feel unreasonably vulnerable, scared, intimidated or isolated;
- make employment or workplace decisions based on merit — not on gender, race, religion, ethnicity, age, disability, or sexual orientation;
- immediately report harassment, bullying or discrimination to management and/or Human Resources, whether this involves you or another staff member;

- have compassion where mistakes are made and where personal challenges impact on work;
- support your fellow colleagues, for example by giving them information on how to report a concern; and
- help our colleagues to be their best.

Providing workplace feedback is not harassment or bullying where it is communicated in a respectful and honest manner.

It is not considered bullying if your supervisor asks you to perform a reasonable request or constructively delivers feedback or counselling around your performance or conduct.

For further guidance please refer to the *HOST Anti-Discrimination and Harassment Policy* and *HOST Workplace Bullying Prevention Policy*.

Conflicts of Interest

A conflict of interest occurs where you have a personal and professional interest at the same time. In these situations, you are often unable to make a decision that is truly in the best interests of HOST and its constituents.

A conflict of interest within the company can cause staff, stakeholders and the people we work for to doubt our

integrity. If a situation creates, or could lead to a conflict of interest, then it should be avoided. Where a conflict of interest cannot be avoided, the conflict must be disclosed to appropriate staff to be managed appropriately.

Some examples of a conflict of interest include:

- Using your role at HOST to acquire goods and services for local community members, stakeholders or clients.
 - Starting a business, or having authority or input in a business that has activities that are the same or similar to HOST.
 - Using your role to secure financial gain through business opportunities that are similar to HOST.
 - Employing your friends or relatives.
 - Accepting gifts, entertainment, and other business courtesies for personal gain.
 - Romantic relationships between co-workers, clients or stakeholders.
- In order to maintain our integrity, we will:
- declare all personal, professional or financial interests that may, or may be seen to, influence the performance of our duties;
 - declare any conflict of interest that arises within our role while conducting business on behalf of HOST;
 - not exploit client/co-worker relationships or knowledge for professional gain or profit;
 - be mindful of potential or perceived power imbalance for expat workers deployed overseas;
 - not use our position with HOST to gain personally, or to be perceived as benefitting personally; and
 - keep friends and relatives out of our reporting lines.

Living the Code – Our Conduct with Each Other

What has occurred?

A family friend would make a great employee for HOST, is it ok for me to recommend them for a position?

What to do

Employees are welcome to notify or nominate people they know about any positions that are publicly available, however all candidates will be assessed on merit and suitability for the role that they apply for. To avoid any conflict of interest, advise the Human Resources department so that any conflicts can be avoided.





Use of Substances- including medications, illicit drugs and alcohol

The use of medications, illicit drugs or alcohol may impact on an individual's capacity to perform work safely, efficiently and with respect, thereby posing a risk to the health and safety of the individual and others in the workplace.

In general staff must:

- arrive at work not under the influence of any substance that could impair judgment or threaten safety; and
 - speak up if you perceive that a staff member may be under the influence of alcohol or drugs at work.

HOST is dedicated to providing a substance-free environment and is committed to supporting staff who have a drug or alcohol problem to recover without this impacting on their work. Speak to a manager or member of the Human Resources team if you need help or know of a colleague who does.

Expat staff are expected to exercise additional discretion as they live and work in the same environment and are unable to maintain the same level of separation between their work and private life. Expat staff are therefore considered to be representing HOST during their entire deployment and must not bring HOST into disrepute by their actions. In particular this requires that alcohol is avoided or consumed in moderation.

For detailed guidance please refer to the
HOST Drug & Alcohol Policy.

highly sensitive and confidentiality of clients is critical. Staff are expected to comply with confidentiality requirements, IT security procedures and to exercise responsibility in ensuring records are kept safe and secure at all times.

Staff must ensure that they create and retain records in keeping with the *HOS Records and Information Management Policy*.

Records Management

HOST is subject to a range of legal, regulatory and best practice requirements to retain and produce certain records. This may include documents, emails, client case files and other forms of communication. This is to ensure **HOST** retains accurate and comprehensive information to evidence the services we provide and ensure **HOST** meets all legal and regulatory requirements.

Records also help to measure the impact we are having with people and communities and to evaluate our services. Therefore, all staff must be diligent in recording their work accurately, clearly and regularly.

The security of our records is critical as we work in spaces where information is highly sensitive and confidentiality of clients is critical. Staff are expected to comply with confidentiality requirements, IT security procedures and to exercise responsibility in ensuring records are kept safe and secure at all times.

Staff must ensure that they create and retain records in keeping with the *HOS Records and Information Management Policy*.

Acceptable use of Technology

HOST will provide staff with access to various Information Communications Technology (ICT) equipment to assist with their daily work. When using ICT devices, staff are advised to utilise ICT in a responsible, legal and transparent manner at all times. HOST may monitor, review and disclose information as deemed appropriate, subject to applicable laws and regulations.

HOST ICT equipment must not be used for illegal purposes including accessing pornography or participating in online discrimination or harassment.

All ICT equipment supplied by HOST must be well maintained by all staff and secured in a safe location.

Technology is an important part of our work and should be respected accordingly. All staff are expected to access training when available to ensure that they know how to use all aspects of HOST technology required in the course of their work.

Staff should refer to the *HOST ICT Policy* for further guidance.

Host communities play an important role in supporting displaced people who flee crisis. We are committed to working with host communities to respond to their own needs whilst also supporting them to meet the needs of displaced people. To do this effectively we need to be respectful of local culture, laws and customs and develop relationships that are mindful of structural inequalities.

Our Values in Action

The values of respect and integrity outline that we build relationships underpinned by honesty and equality. We will maintain a belief in the potential of every community that we work with and give people a chance to exceed our expectations.

The value of compassion encourages us to understand the structural inequalities that cause some communities to have less capacity and resources. Our role is to help them reach their potential by finding ways of working that lead to mutual benefit.

The values of diversity and innovation lead us to see host communities as a rich source of ideas and untapped potential. Our role is to encourage this potential through education, facilitating access to resources and by sharing our skills, knowledge and experience.

Privacy and Confidentiality

Relevant privacy legislations set a standard for the management of various types of information including personal and health records.

We will treat staff, client, volunteer and contractor data with respect in accordance with our ethical and legal obligations.

We will respect the rights of clients in relation to privacy and will similarly respect the confidences shared by colleagues in the course of their professional relationships and transactions.

All staff are bound by both the ethical and legal aspects of confidentiality.

For further guidance staff can refer to the relevant HOST Privacy Policy and the HOST Confidentiality Policy.

Professional Boundaries

As we deal with vulnerable people, staff are expected to maintain appropriate boundaries with staff members, clients, former clients, volunteers, and locally employed staff. Staff must not engage in activities which are outside the scope of their role with HOST, including but not limited to, sexual, intimate or romantic activities. Staff shall not engage in out of work activities with clients (including meals or social/recreational activities) or attend refugee/local residences unless on official business and with prior approval from a Supervisor/Manager.

It is expected that staff demonstrate and apply a level of judgement when engaging in out of work activities with all stakeholders with consideration to the vulnerability, perception and balance of power between parties. Our purpose is to support clients, however, any form of advocacy must be approved by the Executive Team.





If you have concerns about a current or potential relationship with a client or colleague, it is your duty to disclose this to a Supervisor/Manager or Human Resources staff as soon as possible in order to discuss options to mitigate ethical and business risks.

HOST reserves the right to contact the relevant governing/licensing/certifying body of your profession, or the Police/other local authorities regarding client contact where deemed necessary. These circumstances include situations where

there is an inappropriate relationship between a client who is a minor and a member of staff.

For further guidance staff can refer to the *HOST Appropriate Workplace Behaviour Policy* and *HOST Child Protection Policies and Procedures*.

Corruption and Bribery

Corruption and bribery directly undermine our value of integrity and will not be tolerated in any form. These acts harm communities and put our reputation at risk. Regardless of local custom or the practices of other companies, HOST is committed to avoiding (including the appearance of) impropriety, particularly when dealing with vulnerable people and government officials.

The success of HOST will be built on the quality of our services, our engagement with people and the strength of our reputation. Building strong and respectful relationships with stakeholders and other parties is vitally important.

The giving and receiving of gifts and hospitality has the potential to improperly influence business decisions and may lead to preferential treatment, or the perception of preferential treatment. In order to eliminate this, gifts must always be reasonable, modest, and in compliance with HOST values and policies. All gifts or hospitality given or offered to a HOST employee should be declared to a Supervisor/Manager.

When giving gifts or providing hospitality, everything we offer must be:

- for a legitimate purpose (such as helping to demonstrate a service or getting to know a stakeholder) and not intended to secure an improper business/client advantage;
- permitted by HOST policies and the recipient's policies;
- in compliance with the relevant local laws;
- reasonable in value and appropriate under the circumstances; and
- accurately accounted for through our gift register.

When accepting gifts or hospitality, it is important to avoid even the appearance of impropriety. This means that we:

- never request gifts from stakeholders;
- refuse gifts from stakeholders that are offered around the time of a procurement decision;
- reject gifts in cash or cash equivalents (like gift certificates); and

gifts given to an individual may be considered gifts given to HOST.

If you are unsure about giving or receiving a gift, speak to your Supervisor/Manager for guidance. For further guidance staff can refer to the *HOST Gift Policy*. 

Living the Code – Our Conduct with Communities

What has occurred?

I work as a case manager and have formed and maintained professional relationships with my clients. I see one of my clients more often outside of working hours as they are often at the same local places as me. This client shares some similar hobbies to me and I wanted to take them to my room to listen to some music one evening after work, this is ok isn't it?

What to do

Staff should not engage in activities with clients outside of their role with

HOST or partake in any activities which may give a perception of an inappropriate relationship or the use of an imbalance of power. You should explain to your client that discussing hobbies is fine however engaging in interactions privately can lead to misunderstandings. You may also consider meeting in public and should reflect on the intended outcome from the interaction. Where the interaction meets personal objectives or may be misunderstood, then it may not be appropriate even if your intentions are good.

We want all of our people to be ambassadors for HOST. Our conduct in public must be respectful, mindful of the local cultural context and demonstrate our values.

Our Values in Action

Our values of respect and integrity demand that we are honest and ethical in our dealings with others. This should be extended to when we are not working but still in a position of representation of HOST. Our value of compassion means that we will show concern for human rights and social justice issues more broadly in the communities that we work.

Our value of innovation demands that we actively seek opportunities to innovate and find real and lasting solutions to displacement. Finally, our value of diversity will ensure that we seek to work with a variety of people regardless of background, race, gender or religion and implement this in our recruitment practices.

Social Media and Talking to the Media in General

Social media has changed the way we work and has enabled us to share information more efficiently, engage more effectively with our stakeholders, and better express our value in the community. Social media also provides a public face of HOST and therefore must represent our values and approach.

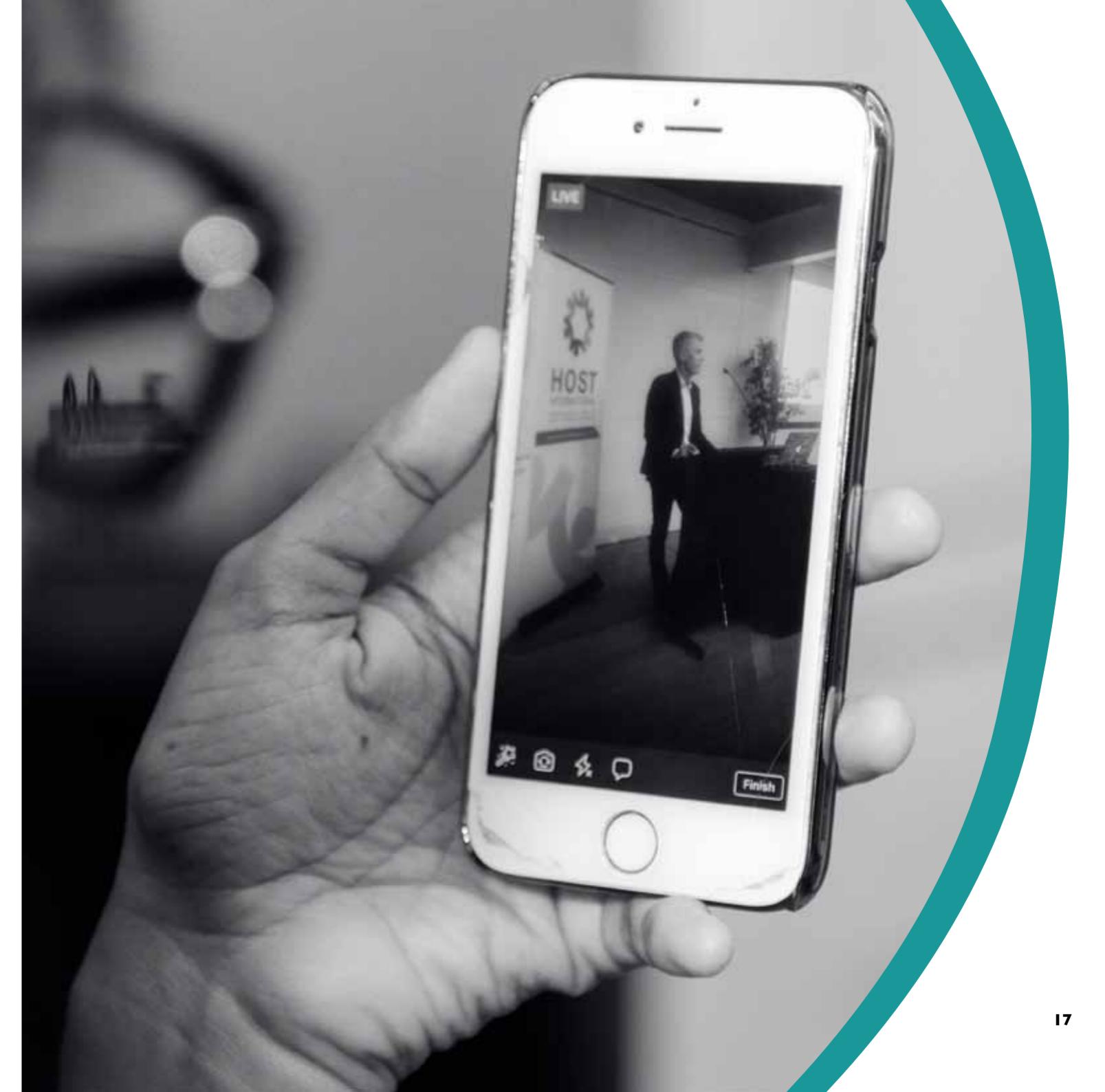
As HOST works in communities where local and international politics are complex and emotive, we require our people to be mindful that their personal social media activity can have an adverse impact on HOST directly and indirectly. The content we share on social media can be misinterpreted or taken out of context, and it can reach a far wider audience than we may have intended, including staff, clients, and the media. Once posted online, information can be difficult or impossible to remove. Before we express ourselves on social media, it is important to pause and consider all possible consequences.

As HOST works with displaced people who are still seeking protection we must also be mindful of not exposing the identity of the people we work with through social media posts. To this end we must be mindful of whether we have consent to post photos or information

about clients. Due to sensitivities around the work of HOST, and to protect the clients that we serve, staff will not make any public comments about the conditions of the local area, people, or services in which HOST operates or about any individual client or group of clients in any circumstance. Our contracts may include restrictions on sharing information and any doubts should be discussed with a Supervisor/Manager.

In order for HOST to work in the places it needs to and to establish the right relationships we need to maintain a level of political neutrality. When our people post or share comments that are critical of governments, stakeholders or other parties we risk undermining trust in HOST and therefore our capacity to work with displaced people who are most in need. Whilst our people are entitled to their individual views we expect that staff will remain neutral in their public social media comments whilst they work with HOST.

Staff must also not use their position to assist public and legal advocates to access information or clients without permission from HOST. Staff should exercise caution in relation to individual advocacy and discuss strategies first with their Supervisor/Manager. HOST does not support public advocacy for individuals or groups of individuals via social media. In order to monitor this,



HOST will at times review open source social media outputs for any inappropriate comments.

If you are contacted by the media, you are required to respectfully decline the request and refer all media enquiries to the Communications Manager or CEO. Public comments to media requests may only be made with specific written approval of the CEO or the Chairman of the Board of Directors. Some public information may be posted by senior managers in accordance with an external communications strategy. If you are unsure about what you can and cannot post on social media or in other public outlets, discuss this with your Supervisor/Manager for clarification.

Staff should refer to the *HOST Media Policy* for further guidance.

Legal and Ethical Expectations

As HOST staff, we will act in accordance with the laws of the country we are operating within, such as driving legislation and expected public behaviour.

Where staff have delegated financial authority, all related HOST policies and procedures are to be applied to ensure that the resources of the organisation are used effectively and efficiently.

Staff shall practice honesty within their work and will not falsify any documentation or make any false declarations during their work with HOST. This includes not deliberately misleading each other or stakeholders in the community.

Delivery of services must not proceed without the informed consent of the client/customer. This involves explaining the nature, purpose, costs, alternatives and possible complications of a service.

We will always act with honesty and integrity and report any instance of suspected fraud immediately in line with the *HOST Fraud Corruption Control Policy and Procedure*. All instances of actual, suspected or alleged fraud will be dealt with seriously and investigated appropriately.

For further guidance regarding fraud please refer to the *HOST Fraud Corruption Control Policy and Procedure*.

Living the Code – Our conduct with others

What has occurred?

A Facebook friend has posted negative rants on their personal Facebook feed with reference to our funding bodies and government agencies. I agree with what is being said and want to like the post. What should I do?

What to do

Whilst individuals are entitled to their views, activity on social media by individual staff may create a risk to the client group, staff and to HOST. It is best to avoid making any comments or responses to media that relates to the sensitive work that HOST is involved in and to discuss these issues with colleagues and supervisors. Sometimes negative posts by staff can undermine the broader systemic advocacy that HOST is undertaking behind the scenes.

BRIBERY

The offer, payment or provision of a benefit to someone to influence the performance of a person's duty and/or to encourage misuse of his or her authority.

BULLYING

Repeated, unreasonable behaviour directed towards a worker or a group of workers that creates a risk to health and safety. It includes both physical and psychological abuse.

CLIENT

A person, or group of persons that HOST International is providing a service for in any capacity.

CORRUPTION

Dishonest activity in which an employee, volunteer, partner, subcontractor or Board member acts contrary to the interests of the organisation and abuses his/her position of trust in order to achieve some personal gain or advantage for himself/herself or for another person or organisation.

DISCRIMINATION

When a person is treated less favourably in their employment because of a protected characteristic or attribute. Grounds of discrimination are set out in the EEO Laws and differ between the States and Territories.

EXPATRIATE (EXPAT)

A person temporarily or permanently residing in a country other than their native country for work purposes.

FIFO

Fly in fly out

HARASSMENT

Behaviour that would, to a reasonable person, offend, intimidate, ridicule, insult or humiliate another person. It may include conduct that is verbal, visual or physical such as slurs, disparaging remarks, vulgar language, offensive emails, and threatening behaviour.

HOST

HOST International Ltd and its subsidiaries.

STAFF

People who are employed, contracted or engaged in voluntary work with HOST in order to conduct business or services.



For more information contact
hr@hostinternational.org.au or visit HOSTnet.

HOST International

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