

## Probity and Culture Policy

### Purpose

The purpose of this policy is to define Alliance Housing's approach to establishing and maintaining appropriate standards of probity and culture.

### Scope

This policy applies to all Alliance Housing staff and Board members.

### Intent

As a not-for-profit organisation, Alliance Housing must be able to demonstrate to its stakeholders and to the community that it conducts its business with high standards of probity and accountability. This policy seeks to ensure Alliance Housing is demonstrating an organisational culture which supports these standards.

### Policy

#### **1. Code of Conduct**

Alliance Housing will ensure that it conducts its business, including procurement and provision of services, in an ethical, honest and fair manner. It will adopt and maintain a code of conduct, governing the behaviour of Board members and employees.

The code of conduct will include:

- Independence of the Board
- Conflicts of Interest
- Gifts and gratuities
- Required standards of personal behaviour
- Communication and confidentiality of intellectual property
- Use of Alliance Housing resources
- Handling of Alliance Housing funds
- Mechanisms for identifying and handling conflicts of interest
- Statement of ethical principles
- All Board members and staff will be required to agree to and abide by the code of conduct prior to their commencement.

#### **2. Employment and Appointment**

Employment of staff and the appointment of Board members shall be governed by the relevant policies, which will be supported by processes to ensure that appropriate checks are carried out.

Persons desiring to gain employment or appointment must be of good character, and consideration will be given to previous conduct, any criminal history, and the testimony of referees.

### 3. Fraud, Corruption, and Criminal Behaviour

Alliance will use its best endeavours to foster a culture of service and integrity and acknowledges that no organisation is immune to the possibility of corruption. Alliance Housing will guard against real or perceived conflict of interest by implementing processes to ensure that fraudulent, corrupt or criminal behaviour is detected and handled appropriately as per the attached Fraud, Corruption and Control Plan.

[Fraud,Corruption,ControlPlan.docx](#)

Fraud – To dishonestly obtain or arrange a benefit by deception or other means including:

- Theft such as stealing property, petty cash, gift cards, donations, tenant funds or the organisation’s assets
- Falsification of records, accounts or documents to deceive
- Dishonestly destroying or concealing accounts or records
- Embezzlement or misappropriation of funding or other assets
- Misuse of assets or property for personal benefit
- Forgery or issuing false or misleading statements with intent to obtain financial advantage or deceive.

Corruption – Dishonestly obtain a benefit by misuse of power, position, authority or resources including:

- Bribery, extortion & blackmail
- Secretly permitting personal interests to override the organisation’s interests
- Secretly giving or accepting gifts & benefits in return for preferential treatment to the giver
- Collusion, false quotes, false invoices or price fixing
- Manipulating design & specifications or processes for personal gain or to conceal defects
- Complicity in excessive billing or submission for false support documents or concealment of documents
- Falsifying job qualifications or work or safety certifications
- Nepotism (favouring relatives)
- Privacy breaches or data manipulation with intent to cause harm
- Criminal behaviour is defined as an act or failure to act in a way that violates public law.

Alliance takes a very serious view of self-interested or dishonest conduct on the part of any of its Board or staff and will take all practicable steps to ensure that its standards of probity and accountability are upheld. A Fraud, Corruption and Control Plan

### 4. Whistleblowing

A whistle-blower is a person who informs on another person, or on an organisation, that is suspected of engaging in unlawful or unethical workplace behaviours or activities. This Policy, with the Code of Conduct, outlines the minimum standards of ethical behaviour expected. Alliance Housing encourages and supports staff, Board members and contractors to report suspected misconduct in good faith. All reports will be handled

confidentially and without reprisal, consistent with the Whistleblower Protection Policy and relevant legislation. Should wrong or inappropriate behaviour be detected, it is incumbent upon all to report it.

## 5. Privacy

Alliance Housing collects and administers a range of personal information for its purpose as a Community Housing organisation. Alliance Housing is committed to protecting the privacy of personal information it collects, holds and administers. This includes but is not limited to emails, data, reports, applications and correspondence.

Alliance Housing recognises the essential right of individuals to have their information administered in ways that reflect and are supported by our values and processes, which are compliant with the Privacy Act 1988.

<https://www.legislation.gov.au/Details/C2021C00139>

## 6. Recordkeeping and Accountability

All probity-related actions, including conflict-of-interest declarations, gifts and hospitality registers, and whistleblowing reports, will be documented and retained in accordance with Alliance Housing’s Recordkeeping Policy and relevant legislation

### Legislation and Compliance

This policy seeks to operate consistent with any relevant legislation including:

- *Privacy Act 1988 and amendments*
- *WA Community Housing Framework*
- *Australian Privacy Principles*

### Implementation, Review and Amendments

This policy is applicable from the date of Board Approval.

Alliance Housing will review this policy on a regular basis to ensure it remains up to date.

Document or version number	Amended By	Narrative	Date approved by Board	Status
AH-5PCP-1	Upland Consulting	Original version	19/09/2018	Superseded
AH-5PCP-2	CEO	Section 3 updated	21/11/2018	Superseded
AH-5PCP-3	CEO	Section 4 added	17/07/2019	Superseded
AH-PCP/4	Elysian Consulting	Amended version	20/05/2021	Superseded

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AH-PCP/4	Senior Admin	Review -No changes needed	17/08/2022	Superseded
AH-PCP/5	CEO	Review – insert Whistle blow clause and minor changes and Recordkeeping and Accountability	14/01/2026	Approved