



Staff Code of Conduct

1. Purpose:

- 1.1** Staff at Western Sydney University International College (WSUIC) play a role in promoting the values and in enhancing the reputation of WSUIC. WSUIC's vision and values support an environment in which the team is dedicated to upholding high standards of service and professionalism so that students can learn in a convivial and contemporary environment.
- 1.2** This Code of Conduct defines the standards of conduct required by all WSUIC staff members. The Code also has an educative role and provides a guide to understanding the ethical obligations of staff members and aims to resolve issues which arise in the performance of duties or activities.

2. Scope and Application

WSUIC Code of Conduct applies to all members of the institution, whether full-time, part-time, sessional, and casual or contractors. The Code of Conduct also applies to WSUIC volunteers who contribute to WSUIC activities (such as student mentors and student ambassadors). For the purpose of this Code only, all such members will be termed 'staff members'. This policy defines the framework which underpins the acceptable conduct of staff and other stakeholders in the undertaking of their daily activities at WSUIC and the responsibilities of all parties to comply with its policies, procedures, governance and regulatory requirements.

3. Definitions

N/A

4. Compliance Responsibilities and Obligations

WSUIC Staff members will respect the legal obligations of WSUIC and comply with the spirit of the laws, regulations and codes of both the State and Commonwealth which include and are not limited to ESOS Act, National Code 2018, Higher Education Standard Framework 2021. WSUIC maintains a compliance register that identifies the relevant laws and legal obligations to assist staff members identify and comply with their legal obligations.

5. WSUIC Policy and Procedures

WSUIC will adopt policies and management practices which maintain high professional standards in the delivery of education and training services, and which safeguard the educational interests and welfare of all students. WSUIC staff members are expected to comply with WSUIC policies and procedures.



6. Shareholder/Third Party Policy and Procedures

WSUIC is jointly owned by Western Sydney University and Navitas. Under the conditions of third-party agreements with the shareholders, WSUIC adheres to internal policies that have been designed to align with the shareholder policies. Where there are stated services in the third-party agreements that specifically identify the shareholder directly provides a service or intellectual property, WSUIC staff will adhere to the shareholder policies in the implementation of operations and services.

7. Copyright

WSUIC staff members are expected to comply with relevant copyright laws and POL 49 WSUIC Copyright Policy, in regard to the reproduction and broadcast of materials where the work created by another person is used in academic or other WSUIC activities.

8. Using Course Intellectual Property under Third Party Agreement with Shareholder

Western Sydney University owns all Intellectual Property (IP) associated with WSU Approved Courses and related teaching materials. Under the conditions of the Third-Party Agreement with Western Sydney University, WSUIC delivers Approved WSU Courses using the complete suite of University Intellectual Property related to the Approved Courses and that Western Sydney University International College has a licence to use and adapt Western Sydney University IP as appropriate.

9. Using Intellectual Property related to Higher Education Services and Facilities Provisions in Third Party Agreements with Shareholders

WSUIC complies with the intellectual property right conditions of the Third-Party Agreements with the shareholders, Western Sydney University and Navitas. As such, WSUIC does not claim ownership or independent rights to use shareholder intellectual property unless specified in Third Party Agreements.

10. Respect for Others

Staff members of WSUIC are expected to treat students, other staff members, shareholder staff members, staff members of other organisations and members of the public honestly and fairly; and with proper regard for their rights and obligations. Staff members should be responsive and courteous when communicating and dealing with staff members, students, clients or visitors to WSUIC. In decision making, staff members are expected to be fair when dealing with others and act in accordance with relevant policies.

WSUIC staff members are expected to treat all persons justly, irrespective of gender, sexual orientation, race, disability, religion, marital status, age, political conviction or other grounds.



11. Cultural Sensitivity

Staff members are expected to be understanding and respectful of varying cultural backgrounds, beliefs, customs and opinions. Staff members will conduct themselves in a manner which ensures the cultural values and norms of one nationality are respected by, but not imposed on, other members of WSUIC.

12. Discrimination and Harassment

12.1 WSUIC staff members must treat all persons with whom they come in contact equitably and fairly. Distinctions, exclusions or restrictions based on sex, gender, sexuality, race, disability, religion, marital or parental status, age, political or religious conviction or any other factor that is irrelevant to a person's ability to work, study or access WSUIC services is unlawful discrimination under relevant anti-discrimination laws.

12.2 Harassment is also unlawful under anti-discrimination laws. Staff members must not engage in behaviour which may be unwelcome or which may be distressing, offensive or humiliating to others. Such behaviour may amount to harassment. This would be seen as a potential breach of the employment contract and as a consequence the staff member may have their employment terminated.

12.3 Academic feedback is not discrimination, harassment or bullying.

13. Privacy of Others

13.1 WSUIC Staff members have varying approved levels of access to personal and sensitive information about students, staff and other stakeholders. Staff members must respect the privacy of others when they collect, access or use personal information in the course of their duties or activities. Additionally, staff members should protect the privacy of others and maintain appropriate confidentiality regarding personal matters.

13.2 Staff members with a level of approved access to personal information must not disclose personal information except as permitted by POL 37 Privacy Policy.

14. Decision Making

Staff members should observe fairness in their decision-making by reference to POL 48 Delegation of Authority Policy and Register by:

14.1 giving an affected individual (whether a staff member or a student) the opportunity to understand the 'case to be met' if a decision may be made which will adversely affect their interests, and to respond to it before a decision is made;

14.2 making decisions which are unbiased or uninfluenced by patronage or favouritism (see also section integrity and conflicts of interest);

14.3 making decisions which take into account relevant considerations



15. Respecting the Opinions of Others

Staff members are expected to deal with differing opinions by rational debate, rather than by vilification, coercion, intimidation, bullying or any form of, offensive or humiliating behaviour. Staff members are expected to give fair consideration to the views and contributions of others irrespective of their status or position within the College. Grievances or disputes should be managed by POL 17 Staff Grievance Management and Resolution Policy. Staff members who engage in grievance resolution or other appropriate procedures should not be subject to victimisation or intimidation.

16. Supervisory Behaviour

16.1 Executive Management, Managers and Academic Coordinators with supervisory responsibilities have an important role in creating a fair and just working environment with a dedicated focus to maintain the standards of respect for others.

16.2 Supervisors must:

- 16.2.1 act equitably and consistently in their dealings with all of their staff members;
- 16.2.2 ensure their staff members understand the performance standards expected of them;
- 16.2.3 maintain open, honest and courteous communication with all staff members
- 16.2.4 avoid interactions which may reasonably be perceived as bullying of staff members;
- 16.2.5 ensure workplace health and safety obligations are met, so that their staffmembers work in a safe environment;
- 16.2.6 provide equitable access to appropriate development opportunities;
- 16.2.7 provide reasonable accommodations for staff members with a disability, family responsibilities or to allow religious or cultural observance; and
- 16.2.8 provide effective feedback to staff, which is not considered harassment, bullying or discriminative

17 Integrity

17.1 Conflicts of interest - financial, personal, other organisations

17.1.1 WSUIC expects staff members to recognise, declare and manage conflicts of interest and situations where there is a potential or perceived conflict of interest. Conflicts of interests may be financial or personal and exist where a person's private interests are opposed to, or have the potential to interfere with, the performance of their duties at WSUIC. Staff should adhere to POL 50 Conflict of Interest Policy

17.1.2 It is important to note that conflicts of interests may be actual or perceived. Perceived conflicts of interest exist where it may be perceived that a staff member's private interests are at odds with their WSUIC responsibilities.



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- 17.1.3 WSUIC staff members are expected to declare potential conflicts of interest between their private and/or financial interests and responsibilities at the College.
- 17.1.4 In the event of involvement in a relationship with a student, particularly where it is a close, intimate and/or exclusive one, the member of staff must inform the College Director and Principal. When WSUIC has been informed of a relationship it will consider appropriate action in a manner that protects the integrity of all parties.

WSUIC staff members must declare any relationship that WSUIC considers that close, intimate and/or exclusive relationships between staff and the students. There is a danger that such relationships exploit the relationship of authority and trust that is inherent in the relationship between members of staff and students.

17.2 Gifts

- 17.2.1 WSUIC staff members should not accept gifts where there is an actual or perceived connection between the receipt of the gift and the performance of duties. However, it is acknowledged that staff members will receive gifts on occasion from sources such as agents or students.
- 17.2.2 To alleviate the perceived conflict of interests that may arise from gifts, staff members are required to register gifts in The Gifts Register on SharePoint, where the value of that gift is above \$100.

17.3 Delegated Authorities

- 17.3.1 A WSUIC staff member must not make decisions or enter into transactions on behalf of WSUIC except where it is in accordance with the schedule of delegated authorities.
- 17.3.2 WSUIC staff members will ensure any financial commitment authorised by them will relate to expenditure incurred for official purposes only. Any commitment will comply with the WSUIC schedule of delegated authorities.

17.4 Improper Use of Position

- 17.4.1 Staff members will not improperly use their position or role at WSUIC to undertake or authorise any activity which may result in real or perceived detriment to WSUIC, its students or staff members and/or its shareholders.
- 17.4.2 Conversely, WSUIC staff are free to make public comments on issues that lie within their area of expertise. However, in such situations staff should heed the principles of this policy when providing commentary or opinion on matters relating to WSUIC, its students, other staff and/or its Shareholders.

Staff members are also refrained from using a WSUIC title when expressing their personal views other than within their area of academic expertise or job responsibility. Staff members must ensure they are officially authorised to comment on behalf of WSUIC and/or its Shareholders before doing so.



17.5 Insider Trading

- 17.5.1 Staff members must not use inside information for personal gain. If a WSUIC staff member has inside information (being price sensitive information, information not in the public domain or information about any entity related to WSUIC, the Shareholders or a strategic partner of which has come to their knowledge through their employment at WSUIC, they must not deal in that entity's security or pass that information on to another person or encourage another person to deal in that entity's securities.
- 17.5.2 WSUIC staff members will comply with the Securities Trading Policies of Navitas Limited accessible from the Policies Library (corporate governance category) of the Navitas SharePoint Intranet.

18 Diligence

Staff members of WSUIC are required to exercise proper care and attention in undertaking their duties and to perform their abilities to the best of their ability. Staff members should carry out their work-related activities with due care and attention particularly where information or advice will be relied upon by others.

19 Professional and Conscientious Behaviour

WSUIC staff members are expected to carry out their duties in a professional, responsible and conscientious manner, and to be accountable for their conduct and decisions.

20 Dress standards

Staff members are expected to dress in an appropriate professional manner for the workplace.

21 Use of Company Property

- 21.1 WSUIC Staff members are expected to ensure that the WSUIC's resources are used economically, efficiently and effectively.
- 21.2 Staff members have a responsibility to ensure that WSUIC, Western Sydney University and Navitas resources are only used for legitimate purposes and are not wasted or abused.

22 Workplace Health and Safety

Staff members have an obligation to follow safe work practices, to avoid actions which may harm themselves or others and to report hazards in the work environment. In addition, managers and supervisors are responsible, within the limits of their authority, for ensuring that activities within their area are undertaken with due care and diligence for the health and safety of others.



23 Academic Freedom

WSUIC is committed to the ideal of freedom to undertake intellectual inquiry and the pursuit of knowledge without undue interference or influence. To this end, staff members must recognise that:

- 23.1 Their academic responsibility encompasses an ethical obligation to WSUIC, its Shareholders, the students and society
- 23.2 Their academic freedom does not include a protected privilege to speak out on any matter, to deride or defame individuals, groups or WSUIC and its Shareholders or to ignore the policies or decisions that have been formally made by WSUIC and its Shareholders, or those that WSUIC and its Shareholders are required to observe by law.

23 Consequences of Non-Compliance

The Staff Code of Conduct articulates a set of ethical behaviour and practices which staff members are expected to uphold while engaged in their duties at WSUIC. A staff member whose conduct falls below expectations may be counselled in accordance with the performance management policies of WSUIC. Significant departures from the Staff Code of Conduct may be interpreted as misconduct and responded to as such.

24 Quality and Compliance

- 25.1 This Code of Conduct is reviewed periodically as required (at a minimum every two years) for regulatory compliance, operational currency, the identification of continual improvement opportunities and risk identification and mitigation. This review is reflected in WSUIC's Quality and Compliance and Risk Management Frameworks.
- 25.2 This policy will be available on WSUIC website for students and the WSUIC SharePoint site for staff access.
- 25.3 Emails will be issued to all staff to inform and update them on any changes to the policy and/or procedures and guidelines.
- 25.4 New staff will receive policy information during the induction process where it relates to their position.

26 Relevant Forms and Documents

Gifts Register

<https://westernsydneyedu.sharepoint.com/sites/WSUIC/Compliance/Lists/Gifts%20Register/AllItems.aspx>

27 Related Policies, Procedures and Guidelines

- POL 37 WSUIC Privacy Policy



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- POL 17 WSUIC Staff Grievance Management Policy
- POL 50 WSUIC Conflict of Interest Policy
- POL 48 WSUIC Delegation of Authority Policy and Register
- POL 49 WSUIC Copyright Policy
- Navitas securities trading policies

Amendment History

Approval Authority:	Western Sydney University International College Board of Directors	
Approval Date:	15 December 2020	
Date for Next Review:	14 December 2022	
Revision Date Version Summary of changes		
21/10/2016	1	New Policy Developed and Implemented
07/11/2017	1.1	Clause 16 – addition of 16.4.2 – a reference to staff being able to make public comment in their area of expertise
14/12/2018	1.2	<ul style="list-style-type: none"> • Western Sydney University International College staff members must declare any relationship that Western Sydney University International College considers to be a close, intimate and/or exclusive relationships between staff and the students whom they teach, assess or are otherwise responsible for, raise serious questions of conflict of interest, trust and confidence and dependency in working relationships and of equal treatment in teaching, learning, selection, assessment and research – sentence has been made more clear as there was a contradiction with the first and last part of the sentence (there is an implication that the staff is teaching the student that they are involved in a relationship with). • A few minor typos to be amended. • Scope and application - change to "for the purpose of this Code only • Included reference to where Navitas security trading policies can be found (17.5.2) • Indicated where the Gift Register is located (17.2.2 and 26) • Included 'academic freedom' clause (23) , speaking on behalf of WSUIC in public forums (17.4.2)
28/11/2022	1.4	Legislation updated to reflect current version