

EMPLOYEE INDUCTION PATHWAY & POLICIES

Next Review Date: January 2023



CONTACT

Brendan Morris
General Manager
& CEO

Phone
T: 02 6845 3088

Online
E: manager@maranathahouse.com.au
W: maranathahouse.com.au



CONTENTS

ACKNOWLEDGEMENT OF COUNTRY & CULTURAL SAFETY	3
--	---

OVERVIEW	4
----------	---

ABOUT MARANATHA HOUSE	5
-----------------------	---

VACCINATION RECORDS	6
---------------------	---

NATIONAL POLICE CERTIFICATION AND NATIONAL CRIMINAL HISTORY CHECK	6
---	---

CERTIFICATIONS	6
----------------	---

MANDATORY TRAINING	7
--------------------	---

DECLARATION	7
-------------	---

ACKNOWLEDGEMENT OF COUNTRY & CULTURAL SAFETY

Maranatha House acknowledges the traditional custodians of the land, the Wiradjuri people, and pays respect to Elders past, present and emerging and extends our respect to all First Nations People.

We recognise and respect their cultural heritage, beliefs and continuing connection with the land and rivers. We also recognise the resilience, strength and pride of the Wiradjuri and first nations communities.

Maranatha House lies on the traditional lands of the Wiradjuri people. Almost a third of Wellington's population identify as being Aboriginal and Torres Strait Islander people compared to the NSW state average of 2.9%. Maranatha House extends its respects to staff, residents and broader community that identify as being Aboriginal or Torres Strait Islander.

We acknowledge that employees from Aboriginal and Torres strait Islander communities may need additional support and flexibility in the way that they work at Maranatha House and we are committed to providing support to these and all employees to ensure that they are supported to manage their cultural and community obligations.

Any specific requests for working arrangements can be discussed with the HR Manager or your direct supervisor at any time.

OVERVIEW

This Induction Pathway is designed to assist new employees during the first weeks of their employment. Each new employee will be allocated a buddy who will be responsible for supporting their induction and orientation to Maranatha House.

The objective of the induction program is to:

- Ensure new employees understand the systems, processes and procedures that enable Maranatha House to operate and comply with legislation and accreditation standards.
- Develop new skills and knowledge to ensure consistent and quality care and service provision to residents and their families.
- Retain employees by supporting job satisfaction.
- This booklet will guide you through your induction. This pathway is designed to be self-directed with guidance provided by senior staff within Maranatha House.

Your learning will involve:

- Spending time with your Buddy and supervisor to gain essential information.
- Reading and reflecting on the information provided and relevant to your job role.
- Observing your buddy and other staff perform tasks in accordance with Maranatha House's recommended practice, policies and procedures.
- Doing tasks under supervision and completing skills assessments.
- Successfully completing Mandatory Online Training Modules within the prescribed time period.

If you have difficulties understanding any of the information in this booklet please speak with your buddy or supervisor who can assist you. Throughout and on completion of the induction process, you will have opportunity to discuss your learning and development needs with your supervisor.

In addition to this document, please ensure you complete your Induction Checklist and provide to your Buddy or supervisor.

ABOUT MARANATHA HOUSE

Mission Statement:

The Management and employees of “Maranatha House” take pride in the quality of care given to the residents and are proud of the environment in which they live. We believe that nothing is so good that it can’t be bettered. Our purpose is to provide quality care in a caring environment for the aged and disabled, both now and in the future.

Vision:

Our vision is to continue to grow to meet the needs of both current and future residents and the community as a whole and to continue to provide quality care in a caring environment.

Philosophy:

Where living life my way is made easy

Maranatha House is guided by the Aged Care Act 1997 and Aged Care Quality Standards (the Standards) which set out expectations for the standard of the workforce. The Standards require Maranatha House to have and use a skilled and qualified workforce, sufficient to deliver and manage safe, respectful, and quality care and services.

Maranatha House believes that every resident deserves quality care and services when they need them from people who are knowledgeable, capable and caring.

Maranatha House is committed to ensuring:

- Our workforce is planned to enable the delivery and management of safe and quality care and services.
- Workforce interactions with consumers are appropriate, kind, caring and respectful of each consumer’s unique identity, culture and diversity.
- Our workforce is competent, and our employees have the qualifications and knowledge to effectively perform their roles.
- Our workforce is recruited, trained, equipped and supported to deliver the required and expected outcomes.
- Regular and ongoing assessment, monitoring and review of the performance of each employee.

Maranatha House has put in place the following induction pathway to ensure our employees have access to consistent and comprehensive training to meet the requirements set by the Standards.

VACCINATION RECORDS

All employees are required to provide proof of up-to-date COVID-19 vaccination either through:

1. A COVID-19 Digital Certificate – for individuals who have received all required doses of a vaccine as approved for use in Australia.
2. An Immunisation History Statement – which displays all vaccinations or medical contraindications and authorised exemptions, including COVID-19, that have been reported to the Australian Immunisation Register.

All employees are required to provide proof of the up-to-date influenza vaccination. Proof can be provided through an Immunisation History Statement.

These documents should be emailed through to hr@maranathahouse.com.au.

NATIONAL POLICE CERTIFICATION AND NATIONAL CRIMINAL HISTORY CHECK

Staff must provide one of the following:

- a National Police Certification (NPC) from a certified police agency; OR
- a National Criminal History Check (NCHC) from an Australia Criminal Intelligence Commission-accredited agency

The date on each NPC or NCHC must be within 90 days of submitting your application.

A statutory declaration must be provided if:

- former or current names are not shown on the NPC or NCHC,
- the staff member was a resident of a country other than Australia after turning 16 years old.

The declaration should say whether the person has committed an indictable offence. That's an offence:

- against a law of the Commonwealth or a State or Territory.
- against the law of a foreign country that corresponds to an offence against a law of the Commonwealth or a State or Territory.

These documents should be emailed through to hr@maranathahouse.com.au.

CERTIFICATIONS

Required certifications vary by role:

- Aged care worker - Minimum of Certificate III in Aged Care
- Registered Nurse – Current registration with NSW Nurses Registration Board and APHRA and a copy of qualification
- Allied Health – Current registration with APHRA and copy of qualification

These documents should be emailed through to hr@maranathahouse.com.au.

MANDATORY TRAINING

ONLINE COURSE	COMPLETION TIMELINE	CARE & CLINICAL	HOSPITALITY	MANAGEMENT & ADMINISTRATION
COVID-19 in a Care Environment	First two weeks	✓	✓	✓
A Guide to Safe Food Handling	First two weeks	✓	✓	✓
Abuse, unexplained absences and SIRS	First two weeks	✓	✓	✓
Fire Safety: A Practical Approach	First two weeks	✓	✓	✓
Aged Care Quality Standards	First two weeks	✓	✓	✓
Antimicrobial Stewardship	First two weeks	✓	✓	✓
Dementia: An Introduction	First month	✓	✓	✓
Duty of Care and Negligence	First month	✓	✓	✓
Recognising and Assessing Pain	First month	✓		✓
Falls: Balancing Risk	First month	✓	✓	✓
Caring for Indigenous Australians	First month	✓		✓
Responding to behavioural symptoms of dementia	First month	✓		✓
Wound Care: Skin Tears	First month	✓		✓

DECLARATION

I have read and understood the above Employee Induction Pathway, and agree to comply with its provisions at all times while working in Maranatha House.

By signing this Policy I acknowledge my commitment to achieving the best outcomes for consumers and playing my part in ensuring that my working environment is safe and supportive.

Employee name:

Signature:

Manager name:

Signature:

Date: _____

INDUCTION CHECKLIST

Once you have completed your Induction Checklist,
provide to your supervisor or email: hr@maranathahouse.com.au

New starter name and role:

Start date:

Buddy name and role:

BEFORE YOU COMMENCE

- ☐ Provide proof of appropriate level of COVID-19 vaccination
- ☐ Provide proof of up-to-date influenza vaccination
- ☐ Provide either: National Police Certification (NPC) from a certified police agency or National Criminal History Check (NCHC) from an Australia Criminal intelligence Commission-accredited agency
- ☐ Provide copies of qualifications and certifications
- ☐ Collect Maranatha House t-shirt

ON YOUR FIRST DAY

- ☐ Provide completed employment pack including:
 - ☐ Payroll form
 - ☐ TFN form
 - ☐ Tax-free threshold form
 - ☐ Superannuation form
 - ☐ Staff education agreement
 - ☐ Confidentiality agreement
- ☐ Order uniform (clinical team only)
- ☐ Meet with allocated Buddy
- ☐ Learn clock-in/out process
- ☐ Site tour
- ☐ Emergency evacuation process

IN YOUR FIRST 2 WEEKS

- ☐ Complete training (as outlined in Table 1 of the Induction Pathway)
- ☐ Complete systems orientation

IN YOUR FIRST MONTH

- ☐ Complete training (as outlined in Table 1 of the Induction Pathway)

CONFIRMATION OF COMPLETION

New starter signature:

Assistant manager signature:

Date:

Date:

CONTACT

Address

PO Box 42
127/137 Whiteley St
Wellington NSW 2820

Phone

T: 02 6845 3088

Online

E: reception@maranathahouse.com.au
W: maranathahouse.com.au



MARANATHA HOUSE CODE OF CONDUCT

Next Review Date: January 2023



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CONTENTS

PURPOSE	3
MANDATORY REQUIREMENTS	3
IMPLEMENTATION	3
A MESSAGE FROM THE CEO	4
1 INTRODUCTION	5
1.1 Why we have a Code	5
1.2 Definitions	5
2 APPLYING THE CODE	5
2.1 Who does the Code apply to?	5
2.2 Responsibilities under the Code	6
2.3 What happens if there is a breach of the Code	6
2.4 What to do if you are concerned about a breach of the Code	6
2.5 Protection for people who raise concerns about a breach of the Code	6
3 MARANATHA HOUSE CORE VALUES	7
4 THE CODE OF CONDUCT	8
4.1 Promote a positive work environment	8
4.2 Demonstrate honesty and integrity	8
4.3 Acting professionally and ethically	9
4.4 Use official resources lawfully, efficiently and only as authorised	10
4.5 Maintain the security of confidential and / or sensitive official information.	10
4.6 Maintain professional relationships with consumers or clients.	11
DECLARATION	11

PURPOSE

The Maranatha House Code of Conduct defines standards of ethical and professional conduct that are required of everyone working in Maranatha House in any capacity, the outcomes we are committed to, and the behaviours which are unacceptable and will not be tolerated.

The Code of Conduct assists with building a positive workplace culture based on our core Maranatha House values of collaboration, openness, respect and empowerment.

The intent of the Code is to provide a framework to promote ethical day-to-day conduct and decision-making. It does not and cannot cover every situation that can arise in the workplace. The Code does not replace the need for common sense in how staff conduct themselves.

MANDATORY REQUIREMENTS

All employees, contractors, volunteers, students, researchers and persons undertaking or delivering training or education in Maranatha House must abide by the Code of Conduct and the core values and principles that it promotes.

IMPLEMENTATION

All employees, contractors, volunteers, students, researchers and persons undertaking or delivering training or education in Maranatha House must be given a copy of the Code of Conduct to read and sign on commencement of work in Maranatha House.

Managers must ensure that the staff that they supervise are aware of and understand their responsibilities under the Code.

A MESSAGE FROM THE CEO



At Maranatha House we are committed to providing the best person-centred care and health services possible, and to the goals of protecting and improving the health of our consumers.

To achieve this, everyone working in NSW Health must promote a positive working environment where everyone's contribution is valued. Teamwork and respectful staff relations are essential.

Everyone working in Maranatha House should expect to be treated, and must treat others, with respect, dignity and fairness. High standards of workplace practice and conduct improve staff morale. They also produce more effective working relationships and enhanced patient outcomes. In particular, bullying and / or harassment will not be tolerated.

This Code seeks to provide the basis for developing a positive workplace culture – a culture which reflects our core values of Collaboration, Openness, Respect and Empowerment whilst practicing and promoting Trust, Service and Accountability.

I ask everyone working in Maranatha House to make themselves aware of the Code, and to implement and adhere to the Code's provisions and to the Maranatha House core values on which it is based.

A handwritten signature in black ink, appearing to be 'B. Morris', written over a light grey rectangular background.

Mr Brendan Morris
General Manager & CEO

1 INTRODUCTION

1.1 Why we have a Code

The reason we have a Code of Conduct is so there can be no doubts about the standards of ethical and professional conduct that are required of everyone working in Maranatha House, the outcomes we are committed to, and the behaviours which are unacceptable and will not be tolerated.

A Code of Conduct assists with building a positive workplace culture based on our core Maranatha House values of collaboration, openness, respect and empowerment.

The intent of the Code is to provide a framework to promote ethical day-to-day conduct and decision making. It does not and cannot cover every situation that can arise in the workplace. The Code does not replace the need for common sense in how staff conduct themselves. If staff are in doubt as to what conduct is appropriate in any particular situation, or how the Code should be applied, they should seek advice and direction from their manager or a more senior member of staff.

Managers have a key role in ensuring staff understand the Code and in enforcing the standards it sets, consistently and fairly. However, the most important responsibility of managers, and their most valuable contribution to ensuring that the standards set out by the Code are implemented, is to lead by example.

The Code also provides guidance on how to raise and report breaches of the standards it sets.

1.2 Definitions

Maranatha House – refers to the Aged Care Facility and Maranatha Gunyah Intergenerational Learning Centre.

2 APPLYING THE CODE

2.1 Who does the Code apply to?

This Code applies to:

2.1.1 Persons who are employed in Maranatha House whether on a permanent, casual or temporary basis, and

2.1.2 Contractors (including visiting practitioners, agency staff and volunteers) working in Maranatha House, and

2.1.3 Students, researchers or persons undertaking or delivering training or education in Maranatha House,

2.2 Responsibilities under the Code

All staff are responsible for applying and complying with the Code.

Managers are responsible for ensuring that the staff who they supervise are aware of and understand their responsibilities under the Code.

2.3 What happens if there is a breach of the Code

There is a range of consequences for breaches of this Code depending on the nature and seriousness of the matter.

Managers have a responsibility to address alleged breaches of the Code promptly, and in a fair and reasonable manner. They need to assess the seriousness of any alleged breaches, and how they should be dealt with.

Possible outcomes for a staff member who has breached the Code may be:

- Counselling
- Performance improvement plans
- Formal disciplinary action
- Referral to the relevant registration board when the staff member is a registered health practitioner
- Referral to the police in cases of suspected possible criminal activity
- Referral to other Government agencies, such as the Independent Commission Against Corruption, or
- Termination of employment.

Certain sections of the Code reflect the requirements of legislation, and breaches of these conditions may be punishable under law.

2.4 What to do if you are concerned about a breach of the Code

Staff should report any breach or concerns about a breach of the Code to their manager.

If staff are not comfortable about reporting to their manager, they should report the matter to a more senior staff member. In some circumstances, such as allegations of corruption, there is a mandatory requirement to report matters to external agencies.

2.5 Protection for people who raise concerns about a breach of the Code

Maranatha House is committed to protecting any person who raises concerns about a breach of the Code from retaliation or reprisals. Any attempt to take detrimental action against a person who raises a legitimate breach of the Code will be treated seriously and may lead to disciplinary action.

3 MARANATHA HOUSE CORE VALUES

The Maranatha House CORE values are:

- Collaboration
- Openness
- Respect
- Empowerment.

We strive to reflect these CORE values in our workplaces and in our conduct by demonstrating the following characteristics:

Collaboration

- We are an organisation that believes in its people and is people centred.
- Our leaders are role models for our core values and they are accountable.
- We willingly work in teams to provide excellent levels of care.
- Our teams are strong and successful because we all contribute and always seek ways to improve.
- We encourage and recognise outstanding performance.

Openness

- We want our community to have confidence in their local health and care services.
- We foster greater confidence and cooperation through open communication.
- Our performance is open to public scrutiny through patient and employee surveys.
- We welcome and use feedback as a tool to do better.
- We encourage those around us to speak up and voice their ideas as well as their concerns by making it clear that speaking up is worthwhile and valued.
- We communicate clearly and with integrity.

Respect

- We never lose sight of our consumers' fundamental right to be treated with dignity, compassion and respect.
- We listen to consumers, the community and each other.
- We welcome new ideas and ways of doing things to improve patient care.

We treat our colleagues and consumers with dignity and respect, and care about those around us.

- Each of us is responsible for workplace culture and performance.
- We have zero tolerance for bullying and no-one, no matter how senior, is exempt.

Empowerment

- We encourage and support local decision making and innovation.
- We accept that with local decision making comes responsibility and accountability.
- We make best use of resources and experience to meet consumers and community expectations.
- While we seek direction from our leaders, we believe that everyone is empowered to make a difference in our workplace.
- As individuals, we can improve our workplace culture and performance by addressing issues that hold us back.
- We strive for individual excellence on behalf of our consumers and our teams, and to deliver the best possible care and services.

4 THE CODE OF CONDUCT

The Code requires staff to adhere to the standards set out below. The standards in this Code also apply to social activities that take place outside work premises and to the making of comments about other staff, consumers, and consumers' family members or visitors on social media where the status of the person making the comments as a Maranatha House staff member is indicated or can be inferred.

4.1 Promote a positive work environment

Staff must:

- 4.1.1 Treat consumers and members of the public with courtesy and respect and with due sensitivity to the needs of people with different backgrounds and cultures
- 4.1.2 Treat all other members of staff (irrespective of whether they are at the same level of seniority, or more senior or junior) in a way that promotes harmonious and productive working relationships, and a collaborative teamwork approach
- 4.1.3 Not bully or harass other staff, consumers or members of the public, or discriminate against them on the basis of their sex, race, ethnic or ethno-religious background, marital status, pregnancy, disability, age, homosexuality, transgender or carers' responsibilities
- 4.1.4 Not encourage or support other staff in harassing or bullying, or in acting in a way that is contrary to harmonious working relationships between staff members
- 4.1.5 Where appropriate, attempt to settle any complaints, disagreements or grievances involving other staff themselves in the first instance; or pursue such matters through their manager or a more senior member of staff in a way which is proportionate to the issues raised, utilises applicable Maranatha House policies, and recognises that in any process to resolve such matters other staff also have perspectives and rights.

4.2 Demonstrate honesty and integrity

Staff must:

- 4.2.1 Avoid situations which may give rise to pecuniary or other conflicts of interest, and should any conflicts or possible perceptions of such conflicts arise declare them immediately to their manager.
- 4.2.2 In general, not deal with the finances of consumers or clients, but where such dealings occur in the best interests of the patient or client, report the full details to their manager
- 4.2.3 Ensure that their actions and decisions are not influenced by self-interest or considerations of personal gain or other improper motives
- 4.2.4 Not accept bribes or inducements that are intended to influence their decisions or actions and
- 4.2.5 Not accept gifts where they are, or could be reasonably interpreted as being, designed to secure influence or preferential treatment in favour of the giver, which means that token or inexpensive gifts offered as an expression of gratitude, such as chocolates from a patient, can be accepted.
- 4.2.6 Provide honest and accurate comments when giving staff references

- 4.2.7 In dealings with former staff members of Maranatha House not give them, or appear to give them, favourable treatment or access to privileged information.

On leaving employment, staff must:

- 4.2.8 Not use or take advantage of confidential information obtained in the course of their previous official duties to seek gain or profit, unless and until this information is publicly available
- 4.2.9 Not take documents that are the property of Maranatha House to another position prior to or after resignation.

4.3 Acting professionally and ethically

Staff must:

- 4.3.1 At all times act in a way which is consistent with Maranatha House's duties of care to its consumers and clients, and its obligations to provide a safe and supportive environment on its premises for consumers and their family members
- 4.3.2 Not be under the influence of alcohol or drugs when commencing work and while at work
- 4.3.3 Be in a fit and proper condition to carry out their duties when commencing work and while at work
- 4.3.4 Dress in a way that is appropriate for the work they do, and complies with any local dress requirements
- 4.3.5 Carry out their duties diligently and efficiently
- 4.3.6 Not absent themselves from the workplace without proper notification, when they are meant to be on duty; nor engage in any form of outside practice or employment or other activities when they are meant to be on duty and working for Maranatha House
- 4.3.7 If working as a full time employee, seek approval from the CEO to undertake secondary employment; and if working as a part-time employee seek such approval if there is potential for a conflict of interest with Maranatha House employment, or if the total work being undertaken raises issues about excessive working hours. Such approval for other employment must not be unreasonably withheld
- 4.3.8 Comply with all lawful and reasonable directions given by their managers or other members of staff authorised to give them
- 4.3.9 Comply with all applicable Maranatha House policies and procedures
- 4.3.10 Maintain and enhance their professional standards and skills, and keep up to date with best practice including undertaking all mandatory training
- 4.3.11 Observe all laws, professional codes of conduct and ethics relating to their profession
- 4.3.12 If professionally registered, report all changes in professional registration (such as the imposition of conditions on registration) to their manager

- 4.3.13 Avoid conduct that could bring Maranatha House or any of its staff, consumers or clients into disrepute, including when using social media
- 4.3.14 Act in a way which protects and promotes the interests of Maranatha House
- 4.3.15 Only provide official comment on matters related to Maranatha House if authorised to do so with the express written permission of the CEO
- 4.3.16 When making public comment on issues or participating in political or industrial activities, not indicate or imply that their views are those of Maranatha House
- 4.3.17 Carry out their duties in a politically neutral manner
- 4.3.18 Report criminal charges and convictions against them involving offences punishable by imprisonment for 12 months or more to the CEO within 7 days of the charge being laid or a conviction recorded
- 4.3.19 Report immediately to the HR Manager, upon becoming aware of an allegation, charge or conviction involving an under 18-year-old against another Maranatha House staff member
- 4.3.20 Report immediately to Facility Management, any episode or incident of clinical care which raises concerns about standards of clinical care or about possible clinical malpractice.

4.4 Use official resources lawfully, efficiently and only as authorised

Staff must:

- 4.4.1 Use work resources efficiently
- 4.4.2 Use all equipment, goods, resources and materials provided for work-related purposes only, and not for outside clinical or business practice or political purposes: for example staff cannot operate a private business from the workplace, proselytise in favour of a particular religious belief or beliefs, decorate official vehicles with political slogans, or use work tools to make repairs to personal property or carry out home renovations. However, reasonable personal use may be made of equipment (such as phones, computers or photocopiers) provided that work performance is not affected and any instructions about such personal use are followed
- 4.4.3 Follow any special directions or conditions that apply to the authorised use of official resources such as the use of cars for non-official purposes, and
- 4.4.4 Not use Maranatha House internet and email resources for accessing, transmitting, storing or downloading pornographic, sexually explicit or otherwise inappropriate material.

4.5 Maintain the security of confidential and / or sensitive official information.

Staff must:

- 4.5.1 Keep confidential all personal information and records, including not discussing or providing information on social media that could identify consumers or divulge consumer information
- 4.5.2 Not use or release official information or records without proper authority

- 4.5.3 Maintain the security of confidential and / or sensitive information, including that stored on communication devices
- 4.5.4 Not disclose, use or take advantage of information obtained in the course of official duties, including when they cease to work in Maranatha House.

4.6 Maintain professional relationships with consumers or clients.

Staff must:

- 4.6.1 Not take an unfair advantage of, or exploit any relationship with, consumers or clients in any way, including not engaging in on-line friendships with consumers or clients via social media; staff may accept consumers and clients as members of their professional pages that contain information relating to the professional practice of the staff member
- 4.6.2 Not have any sexual relationship with a consumers or client during a professional relationship.

DECLARATION

I have read and understood the above Code of Conduct, and agree to comply with its provisions at all times while working in Maranatha House.

By signing this Code I acknowledge my commitment to achieving the best outcomes for consumers and playing my part in ensuring that my working environment is safe and supportive.

Employee name:

Signature:

Manager name:

Signature:

Date:



MARANATHA HOUSE PRIVACY & CONFIDENTIALITY POLICY

Next Review Date: January 2023



CONTACT

Brendan Morris
General Manager
& CEO

Phone
T: 02 6845 3088

Online
E: manager@maranathahouse.com.au
W: maranathahouse.com.au

CONTENTS

BACKGROUND	3
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PROCESS GUIDANCE	3
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OUTCOME	3
1 Respect privacy and confidentiality	3
2 Private Facility Radio Network	4
3 Collection and use of client information	4
4 Advise consumer of rights to access records	4
5 Seek consent to use consumer images and audio/visual recordings	5
6 Advise consumers of right to complain of privacy breach	5
7 Exclusions	5

DECLARATION	5
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BACKGROUND

We commit to privacy and confidentiality of the consumer's personal information (including health information). Privacy for consumers may relate to physical environment, possessions, physical needs, personal relationships and personal information.

To achieve this:

- consent to collect and hold consumer information must be obtained when service starts
- information on records we hold must be provided to the consumer or their representative as well as the process access their own personal information if they wish
- any consumer files held manually or electronically are securely stored and access is restricted to those staff required to do so as part of their usual duties
- all staff sign a confidentiality agreement when first employed which commits them to respecting the privacy and confidentiality of each consumer when we:
 - provide care to them
 - discuss a consumer's care and service requirements
 - store a consumer's personal information whether this relates to medical needs or general information

PROCESS GUIDANCE

Outcome

The process below demonstrates we respect the consumer's privacy and keep their personal information confidential.

1 Respect privacy and confidentiality

Ask permission from consumers before entering their home, room or private areas. It is mandatory for all facility staff (including contractors and volunteers) to:

- Knock on the consumer's door and await a response
- Announce yourself and your intent
- Ask permission to enter the room (this does not apply to a suspected emergency incident)
- Respect the consumer's personal property e.g. do not use it unless invited to do so or open/read consumer mail unless they request this or need assistance.
- Provide privacy to each consumer for personal care activities e.g. bathing, toileting, dressing and personal/intimate relationships and other personal activities e.g. when speaking with visitors and during phone conversations if the consumer or their representative chooses
- Treat all information relating to consumers confidentially and when required to share it, do so in a way that maintains their privacy and confidentiality e.g. conduct handovers between shifts in areas where information cannot be overheard by those who should not have access to it. This also applies to information given to health care professionals or representatives involved in the consumer's care or services. Any health care professionals who requires access to the consumer's electronic records or personal information must provide request in writing and be approved by the consumer or their representative.

- General gossip and the spreading of false, malicious or borderline information between staff and consumers is strictly prohibited. Some negative consequences of workplace gossip are erosion of trust and morale. Lost productivity and wasted time and increased anxiety among employees as rumours circulate without clear information as to what is and isn't fact. Engaging in behaviour may constitute a breach of the Maranatha House Code of Conduct

2 Private Facility Radio Network

- Employees are to utilise the Maranatha House private radio network using the portable radio supplied. Personal portable radio earpieces must be utilised to ensure radio transmission privacy.

3 Collection and use of client information

- The consumer's agreement includes obtaining consent to collect and share information with relevant professionals for the purposes of their care.
- The consumer receives a Collection Statement which outlines the types of personal information collected, how it is collected and used, how it may be disclosed, the importance of complete and accurate information.
- We collect personal information from the consumer only, unless they consent to collection from someone other than them, or it is unreasonable or impractical to do so.
- Staff must not seek more information about the consumer than is necessary to provide care and services.
- Staff will not release consumer information to any third party without consumer consent. Any consumer information is released and/or accessible only to those with a legitimate interest or need as part of their care or service role.
- Sometimes other personal information must be collected about the consumer's families and social relationships, personal interests, skills, behaviour patterns and financial affairs, to provide services. We will explain clearly the purpose of this collection to the consumer or representative.
- Staff will not proceed with client assessment, care coordination or planning processes without consumer consent. If the consumer cannot provide consent, staff seek consent from their representative.
- Documentation on all consumer file notes is written objectively, observing:
 - respect for the consumer's feelings and dignity
 - the consumer's right to request and have access to their own records
 - freedom of information and court requirements that may subpoena consumer files.

4 Advise consumer of rights to access records

- We will inform consumers of their right to access their information in their Agreement and Collection Statement, and will remind them from time to time through service reviews and agreement renewal.
- Once created, consumer files cannot be deleted. A consumer may request an amendment to their record if they believe the information is incorrect and to ensure it is accurate, up to date, complete, relevant, and not misleading. If the consumer refuses to correct the information, it must provide written notice to the consumer with reasons and how to submit a complaint about the refusal.
- Consumers must request access to their information in writing, and we must respond within 14 days of receipt and provide a reason if access is denied.

5 Seek consent to use consumer images and audio/visual recordings

- If an image or audio/visual recording is required for any purpose, we will seek consent from the consumer or representative using the Consent to Use Information and Images form.
- We will keep and update a register of consents. On receipt of any written notice of withdrawal of consent, we will check the register before using any image.
- If we intend to use consumer images in communication brochures or similar activities, we must obtain written informed consent from the consumer or representative for that situation only. The image cannot be retained for some possible future use.
- Registered Clinicians may seek verbal permission from a consumer to capture an image for the purpose of clinical documentation in eCase. Any clinical images must be deleted immediately from the mobile device after upload to eCase.

6 Advise consumers of right to complain of privacy breach

- We will inform consumers about their right to complain about a privacy breach and the process for making a complaint. This information sets out the way that we manage the complaint.
- Alternatively, the consumer may complain to the Office of the Australian Privacy Commissioner within 6 months of the breach.

7 Exclusions

- If a significant threat to consumer or staff safety affects the consumer's right to privacy and confidentiality, staff safety will prevail.
- We will provide access to consumer records without obtaining consent if:
 - there is a serious threat to the life, health or safety of any individual or public health and safety
 - it would unreasonably infringe the privacy of other individuals
 - the information relates to legal proceedings or is in some way illegal or unlawful.

DECLARATION

I have read and understood the above Privacy and Confidentiality Policy, and agree to comply with its provisions at all times while working in Maranatha House.

By signing this Policy I acknowledge my commitment to achieving the best outcomes for consumers and playing my part in ensuring that my working environment is safe and supportive.

Employee name:

Signature:

Manager name:

Signature:

Date:



SOCIAL MEDIA POLICY

Next Review Date: January 2023



CONTACT

Brendan Morris
General Manager
& CEO

Phone
T: 02 6845 3088

Online
E: manager@maranathahouse.com.au
W: maranathahouse.com.au

CONTENTS

1. COMMITMENTS	3
2. SOCIAL MEDIA	3
3. APPLICATION OF POLICY	4
4. EMPLOYEE ACKNOWLEDGEMENTS	4
5. PERSONAL SOCIAL MEDIA AND EMAIL USE WHILE ON DUTY	4
6. WORK RELATED SOCIAL MEDIA USE	5
7. REPRESENTING OUR ORGANISATION ONLINE	5
8. PERSONAL SOCIAL MEDIA USE WHILE OFF DUTY	6
9. INTELLECTUAL PROPERTY	6
10. CONFIDENTIALITY	6
11. DISCRIMINATION, BULLYING AND SEXUAL HARASSMENT	7
12. SECURITY PRACTICES	7
13. STANDARDS FOR SOCIAL MEDIA USE GENERALLY	8
14. BREACH	9
15. REPORTING	9
16. HOW TO MAKE A REPORT OR SEEK ASSISTANCE	9
17. DECLARATION	9

1. COMMITMENTS

We are committed to providing all Employees with a professional workplace which is pleasant, safe, inclusive and fulfilling.

We respect the rights of our Employees to engage in public discussion and debate on social media or otherwise.

We also expect that our Employees will at all times act professionally and ethically on social media, will honour their obligations to us, and will act in a way that maintains our professional standards and reflects our values.

Your personal activity on the internet may be subject to this Social Media Policy (“Policy”) if it impacts the business of our organisation, our Employees, or your work at our organisation.

Please take the time to read and review this Policy as thoroughly as possible. If you have any questions, please reach out to your manager or supervisor.

This Policy is intended to serve as a guide and does not create any contractual obligation on any party.

2. SOCIAL MEDIA

- (a) In the context of this Policy, “Social Media” means mobile and web-based applications for user-generated content, communication, and social interaction.
- (b) This Policy covers all Social Media services, platforms and applications including but not limited to:
 - (I) social networking sites such as Facebook, Twitter, Instagram, Reddit or Snapchat;
 - (II) video sharing sites such as YouTube, Vimeo or TikTok;
 - (III) professional networking sites such as LinkedIn;
 - (IV) online collaborations such as Slack, Wikipedia, or Google Groups;
 - (V) forums, discussion boards, blogs, online communities, and review sites;
 - (VI) blogging, vlogging, podcasting or other similar activity;
 - (VII) other Social Media services or platforms which may not exist as at the date of this Policy but may be created or developed in future;
 - (VIII) commenting, liking, following, sharing or other similar activity in relation to content on any social media service or platform.

3. APPLICATION OF POLICY

- (a) This Policy applies to all of our employees, including full time, part time and casual employees, temporary employees, permanent employees, managers, supervisors, interns and apprentices, student trainees, volunteers and other representatives of our organisation as well as any persons in the role of director or secretary for our organisation (together hereinafter “Employees”).
- (b) This Policy will cover the following:
 - (I) Employee Social Media activities while at work;
 - (II) use of Social Media by Employees in the course of performing their duties for us;
 - (III) Employee Social Media activities while using our property, resources or electronic devices;
 - (IV) restrictions on representing our organisation online;
 - (V) Employee Social Media activities as a private citizen, while on their own time and not using our property, resources or electronic devices.

4. EMPLOYEE ACKNOWLEDGEMENTS

- (a) Social Media is public and may be distributed worldwide.
- (b) All Employees understand and acknowledge that this Policy asks them to assume that all of their online activities are publicly visible and available at any given time.
- (c) All Employees understand and acknowledge that any content posted on Social Media which reflects negatively on us, has the potential to significantly harm our business and reputation, whether or not that content is published during work hours, or on the Employee’s own time and whether it is published through our Social Media account, or through the Employee’s own Social Media account.

5. PERSONAL SOCIAL MEDIA AND EMAIL USE WHILE ON DUTY

- (a) Employees are not permitted to use Social Media while on duty, except with the express permission of a manager or supervisor.
- (b) Employees are not permitted to use personal email or conduct other personal internet activity while on duty, except with the express permission of a manager or supervisor.

6. WORK RELATED SOCIAL MEDIA USE

- (a) We may choose to use Social Media or other internet based platforms such as CareApp and Xplor to assist with the marketing and promotion of our business. If this occurs then we may ask Employees to assist with or support that marketing and promotional activity (for example, by liking or sharing our posts).
- (b) In the event that we permit or require Employees to use Social Media in connection with their work (for example, by responding to customer service matters via Social Media platforms):
 - (I) We reserve the right to any “friends”, “followers”, or Social Media contacts, email addresses or other contacts that Employees gain through Social Media in connection with their work; and
 - (II) An Employee’s work related Social Media activity may be monitored.

7. REPRESENTING OUR ORGANISATION ONLINE

- (a) Employees may not make a comment, present an opinion, or portray themselves as a representative of our organisation, unless they are specifically authorised in writing by The Maranatha House CEO to do so.
- (b) Employees who are permitted to access our social media accounts in order to post content online will be specifically notified as such in writing. If an Employee is not notified in this manner, they may not use our organisation’s official Social Media accounts or represent our organisation online in any way.
- (c) If an Employee is permitted to officially represent our organisation online, they must:
 - (I) be professional, respectful and polite;
 - (II) act in accordance with the best social networking methods at all times;
 - (III) respect the perspectives and opinions of others;
 - (IV) listen and respond to customer feedback courteously and professionally;
 - (V) never get into arguments with customers or clients;
 - (VI) avoid making promises - if Employees are dealing with a customer service issue, always offer to speak to the customer or client on the phone, rather than making express promises online;
 - (VII) do not answer questions that are not within their expertise. If they need help from senior managers, they should ask before they post;
 - (VIII) follow all of our organisation’s written guidelines, such as our employee handbook, privacy policy, and any other written documents;
 - (IX) remain in constant contact with any relevant member(s) of our marketing team regarding content they post;
 - (X) avoid deleting customer or client comments or questions, even if they disagree with them;
 - (XI) never share our sensitive or confidential information, even if it is not subject to a written policy. Confidentiality is further addressed under the “Confidentiality” section, below;
 - (XII) not post anything involving any form of discrimination, bullying or harassment. Do not post anything involving any content which incites violence or which is abusive, sexist, racist, hateful, threatening, defamatory, offensive, or obscene. Discrimination, bullying and harassment are further addressed under the “Discrimination, bullying and harassment” section, below;
 - (XIII) correct false information about our organisation as soon as possible. Never violate the intellectual property rights of any third party. Obtain proper permission to use any content, and always use the correct attribution form.

8. PERSONAL SOCIAL MEDIA USE WHILE OFF DUTY

- (a) We recognise that Employees, as private citizens, may engage in public discussion and debate on Social Media or otherwise.
- (b) If using Social Media, sending emails, or conducting other internet activity while off duty, Employees have a responsibility of privacy and confidentiality towards us, and must not do anything which may harm us in any way, such as by harming our reputation or by releasing sensitive or confidential information.

9. INTELLECTUAL PROPERTY

- (a) All of our copyrights, proprietary information, trademarks and intellectual property must be respected and maintained with the utmost confidentiality while using Social Media.
- (b) Employees may not use our logos, imagery, branding, business name, email addresses or other intellectual property in connection with their personal Social Media use.

10. CONFIDENTIALITY

- (a) Employees may not discuss any private, sensitive or confidential information about or related to our organisation on any Social Media. This includes but is not limited to information about our operations, activities, security, future plans, challenges, customers, clients, employees, prices, debts, obligations, profits, general finances, or any other information which may reasonably be considered to be private, sensitive or confidential, or which is declared by us to be private, sensitive or confidential.
- (b) Employees may not publish or share any photographs of any other Employees, customers, clients, partners or affiliates on any Social Media except with the express permission of that person and their manager or supervisor.
- (c) Employees may not discuss any other Employees, customers, clients, partners or affiliates on any Social Media except with the express permission of that person and their manager or supervisor.
- (d) Employees may not identify any other Employees customers, clients, partners or affiliates on any Social Media except with the express permission of that person and their manager or supervisor.
- (e) Employees may not discuss their or any other Employee's work conditions, work conditions or rate of remuneration on any Social Media.

11. DISCRIMINATION, BULLYING AND SEXUAL HARASSMENT

- (a) Discrimination, bullying and sexual harassment are not accepted at our organisation, whether they occur in our workplace generally, or via Social Media, and whether they occur during ordinary work hours, or outside of ordinary work hours.
- (b) In addition to this Policy, Employees are required to be familiar with, and to comply with, our Discrimination Policy. Our Discrimination Policy sets out our specific rules in relation to bullying and sexual harassment, which apply to our workplace generally as well as to Employee use of Social Media.
- (c) Employees must not engage in discrimination, bullying or harassment towards any other Employee via Social Media.
- (d) Employees must not engage in any Social Media activity with any other Employee involving any content which incites violence or which is abusive, sexist, racist, hateful, threatening, defamatory, offensive, or obscene.
- (e) If representing our organisation online, Employees must not engage in any form of discrimination, bullying or harassment.
- (f) If representing our organisation online, Employees must not post anything involving any content which incites violence or which is abusive, sexist, racist, hateful, threatening, defamatory, offensive, or obscene.

12. SECURITY PRACTICES

- (a) Employees must take all reasonable security precautions when using Social Media in connection with their work.
- (b) Employees hereby acknowledge and agree that Social Media platforms may contain a large amount of personal information and may pose security risks.
- (c) Employees must make use of any relevant privacy settings, security settings or other settings in order to minimise any security risks when using Social Media in connection with their work.
- (d) Employees must proactively take any other reasonable steps in order to minimise any security risks when using Social Media in connection with their work, for example by restricting the information that they share on Social Media or that they provide when registering accounts on Social Media platforms, using suitable passwords, and regularly changing passwords.

13. STANDARDS FOR SOCIAL MEDIA USE GENERALLY

- (a) When using Social Media, Employees are not permitted to:
 - (I) publish or share any photographs of any other Employees, customers, clients, partners or affiliates on any Social Media except with the express permission of their manager or supervisor;
 - (II) discuss any Employees, customers, clients, partners or affiliates on any Social Media except with the express permission of their manager or supervisor;
 - (III) discuss or communicate with any Employee via any Social Media in any way which could reasonably be considered harassment or bullying;
 - (IV) discuss their or any other Employee's work conditions on any Social Media;
 - (V) discuss any private, sensitive or confidential information about or related to our organisation on any Social Media;
 - (VI) identify themselves as an Employee of our organisation, unless they are authorised to do so;
 - (VII) criticise or complain about our organisation, or any other Employees, customers, clients, partners or affiliates on Social Media;
 - (VIII) make a comment, present an opinion, or do anything else which serves to undermine or contradict the public perception of our organisation in any way, for example by suggesting that our Employees do not agree with or will not implement our policies or procedures.
- (b) In the event that Employees have matters related to their work that they need to discuss, they may approach a manager or supervisor for a confidential discussion.
- (c) All our Social Media accounts will remain owned by our organisation, regardless of any authorisation an Employee may receive to post on them.
- (d) Any media inquiries an Employee receives regarding our organisation must be directed to a manager, supervisor, or marketing team immediately. Employees may not respond to any media inquiries without express written authorisation from us.
- (e) Employees are legally responsible for anything they post on their personal Social Media accounts, including failure to disclose relationships in marketing, or posting about any unlawful activity. If Employees violate any laws while posting on our Social Media accounts, they may be required to indemnify us for any damages caused.

14. BREACH

- (a) Behaviour that breaches this Policy is strictly unacceptable at our organisation.
- (b) If any Employee breaches this Policy, the following disciplinary procedures may apply:
 - (I) a formal warning;
 - (II) a requirement to provide an apology (either verbal or in writing);
 - (III) a requirement to attend discrimination related training;
 - (IV) a requirement to attend counselling;
 - (V) demotion;
 - (VI) a missed opportunity for promotion;
 - (VII) suspension;
 - (VIII) termination.
- (c) These disciplinary procedures will apply equally and fairly to any Employee who breaches this Policy, regardless of that Employee's position or seniority at our organisation.

15. REPORTING

- (a) All Employees are required to comply with this Policy.
- (b) Employees have a duty to proactively report any breach of this Policy to us.
- (c) We take breaches of this Policy seriously. We encourage any Employee who believes a breach may have occurred, to address it promptly.
- (d) In the event that an Employee reports a breach of this Policy, we will handle the reported breach sensitively and confidentially.

16. HOW TO MAKE A REPORT OR SEEK ASSISTANCE

Employees may contact a supervisor or manager for a confidential discussion in relation to this Policy.

17. DECLARATION

I have read and understood the above Social Media Policy, and agree to comply with its provisions at all times while working in Maranatha House.

By signing this Policy I acknowledge my commitment to achieving the best outcomes for consumers and playing my part in ensuring that my working environment is safe and supportive.

Employee name:

Signature:

Manager name:

Signature:

Date:



DIVERSITY, INCLUSION & RESPECT IN THE WORKPLACE POLICY

Next Review Date: January 2023



CONTACT

Brendan Morris
General Manager
& CEO

Phone
T: 02 6845 3088

Online
E: manager@maranathahouse.com.au
W: maranathahouse.com.au

CONTENTS

OBJECTIVE	3
SCOPE	3
APPLICATION	3
EEO LAWS	4
RESPONSIBILITIES OF ALL WORKPLACE PARTICIPANTS	9
BREACH OF THIS POLICY	9
COMPLAINT PROCEDURE	10
OPERATION OF POLICY	12
REFERENCES	13
DECLARATION	13

OBJECTIVE

Maranatha House seeks to provide a work environment where employees and others in the workplace are treated fairly and with respect. Maranatha House also aims to ensure that when employment decisions are made, they are based on merit, not on irrelevant attributes or characteristics that an individual may possess.

Maranatha House further endeavours to provide an environment that is free from discrimination, harassment and bullying and expressly prohibits any unlawful conduct contrary to Equal Employment Opportunity laws (**EEO Laws**) as outlined in this Policy.

SCOPE

Maranatha House, collectively referred to in this Policy as ‘**workplace participants**’. This Policy does not form part of any contract between a workplace participant and Maranatha House and is not, intended to be, contractual in nature. As a result, it is not intended to, and does not, give rise to binding obligations on Maranatha House. However, a breach of a workplace participant’s obligations under this Policy may result in disciplinary action, including up to termination of employment or engagement.

This Policy is not limited to the workplace or to work hours. This Policy extends to all functions and places that are work-related and, as a result, workplace participants must comply with this Policy at all work-related functions eg work lunches, conferences, staff meetings, Christmas parties and client functions. Workplace participants must also comply with this Policy when going to other locations in connection with work eg work-related travel, in work uniform in the community.

EEO laws apply to all areas of employment, including recruitment, terms and conditions of employment, promotion, transfer, training, leave and termination of employment. EEO laws also apply to the provision of goods and services, which means that workplace participants must not engage in any unlawful conduct towards residents of Maranatha House.

APPLICATION

Maranatha House requires all workplace participants to comply with applicable EEO laws by not engaging in unlawful discrimination, sexual harassment, bullying, vilification or victimisation. The key EEO laws that currently operate at a Federal level and in New South Wales are:

FEDERAL

Racial Discrimination Act 1975 (Cth)

Sex Discrimination Act 1984 (Cth)

Disability Discrimination Act 1992 (Cth)

Age Discrimination Act 2004 (Cth)

Australian Human Rights Commission Act 1986 (Cth)

Fair Work Act 2009 (Cth)

Work Health and Safety Act 2011 (Cth)

NEW SOUTH WALES

Anti-Discrimination Act 1977 (NSW)

Work Health and Safety Act 2011 (NSW)

EEO LAWS

Maranatha House takes reasonable steps to endeavour to ensure workplace participants do not engage in unlawful conduct in breach of EEO laws and that workplace participants are not subjected to unlawful conduct in breach of such laws. Workplace participants are legally responsible for their own behaviour. This means a workplace participant may be personally sued if they breach EEO laws. In circumstances where a workplace participant's conduct may involve a breach of any Australian law, Maranatha House may be required by law to notify the police or other relevant authority and reserves its right to do so.

Under EEO laws and this Policy, the following types of conduct are unlawful and strictly prohibited:

- Discrimination;
- Harassment, Sexual Harassment, Racial Harassment;
- Victimisation;
- Vilification;
- Bullying.

Discrimination

Discrimination occurs when a person is treated less favourably in their employment because of a protected ground of discrimination. Protected grounds of discrimination are set by law, differ between the Commonwealth, States and Territories and include sex, race, age etc. A non-exhaustive list of the protected grounds of discrimination is set out below.

Discrimination can also occur in situations where a workplace participant harasses another person because of a certain protected ground of discrimination. Harassment is unwelcome conduct that a reasonable person would expect to offend, humiliate or intimidate. Harassment does not have to be directed at a particular individual to be unlawful. Behaviour which creates a hostile working environment for other workplace participants can also be unlawful in certain circumstances.

A person can unlawfully discriminate against another person even if they did not intend to do so, if they nevertheless treat that person less favourably, on one of the protected grounds below.

Discrimination in employment or in the provision of goods and services is unlawful. Maranatha House may be vicariously liable for such unlawful discrimination in employment or in the provision of goods and services and so Maranatha House expressly prohibits unlawful discrimination by workplace participants. Individual workplace participants may be personally sued if they engage in unlawful discrimination.

Grounds of Discrimination

Anti-discrimination laws at federal and state & territory level are designed to ensure that people are treated fairly and not disadvantaged on the basis of protected attributes, by making certain types of discrimination unlawful in the workplace. It is unlawful to discriminate against (which can include harassment) a person based on a protected ground of discrimination. The grounds across Australia are:

- Sex;
- Gender;
- Age;
- Nationality
- Marital status, relationship status or domestic status;
- Transgender, gender history or gender identity;
- Religion or religious belief, activity or conviction;
- HIV/AIDS or other infectious diseases;
- Physical features;
- Political or religious belief or activity;

- Parental status, parental responsibilities and family responsibilities;
- Carer's responsibilities or carer's status;
- Pregnancy (including potential pregnancy) or breastfeeding;
- Lawful sexual activity, homosexuality, sexual orientation, or sexual preference;
- Disability, impairment (including physical, mental and/or intellectual disability);
- Race (including colour, nationality, national extraction, descent, ethnic, ethno-religious, social origin or national origin);
- Industrial activity or trade union membership;
- Irrelevant criminal record;
- Employment activity;
- Personal association with a person identified by reference to any of the above attributes.

Special Needs Groups – The Act requires all aged care service providers to 'facilitate access to aged care services by those who need them, regardless of race, culture, language, gender, economic circumstance or geographic location' (the Act 201 [e]) and to 'encourage diverse, flexible and responsive aged care services that are appropriate to meet the needs of the recipients of those services and the cares of those recipients; and facilitate the independence of, and choice available to, those recipients and carers' (the Act 2-1 [g]).

The Aged Care Act identifies ten special needs groups which aged care providers need to consider in the development and delivery of their services:

- people from Aboriginal and Torres Strait Islander communities;
- people from culturally and linguistically diverse backgrounds;
- people who live in rural or remote areas;
- people who are financially or socially disadvantaged;
- veterans;
- people who are homeless or at risk of becoming homeless;
- care leavers;
- parents separated from their children by forced adoption or removal; and
- lesbian, gay, bisexual, transgender and intersex people;
- people of a kind (if any) specified in the Allocation Principles.
- Examples of Discrimination (But not limited to)
- Failing to offer training to an older worker because you assume they will retire soon;
- Failing to give a female employee a promotion because she has children or is pregnant;
- Racial or culturally insensitive jokes or racial nicknames;
- Offensive comments about a person's sexuality;
- Teasing a person about their disability; or
- Excluding or isolating a person because of their religion.

Vilification

Vilification is a public act which incites hatred, severe contempt or severe ridicule of a person or group because of a prescribed attribute. The prescribed attributes across Australia are race, religious belief, homosexuality, transgender, disability, transexuality or HIV/AIDS. Serious vilification involves threats of physical violence. Vilification and serious vilification are particularly serious breaches of EEO laws and will be dealt with accordingly by Maranatha House.

Examples of vilification (but not limited to):

- Sending a group/staff email containing a highly offensive racial joke;
- Making derogatory comments about a gay employee in a group of employees.

Harassment

Harassment generally involves unwelcome behaviour that intimidates, offends or humiliates a person because of a particular personal characteristic such as race, age, gender, disability, religion or sexuality. Harassment can also be unlawful and lead to legal action being taken against the perpetrator and in some cases Maranatha House.

Sexual Harassment

Sexual harassment is unwelcome, unwanted or uninvited conduct of a sexual nature that makes a person feel offended, humiliated or intimidated. It can be physical, verbal, written or pictorial. Conduct can amount to sexual harassment even if the person did not intend to offend, humiliate or intimidate the other person. However, conduct will not be sexual harassment if a reasonable person, having regard to all the circumstances, would not have anticipated the possibility that the conduct would offend, humiliate or intimidate the other person.

Sexual harassment in the workplace is unlawful. Maranatha House may be vicariously liable for sexual harassment at work and so Maranatha House expressly prohibits sexual harassment in connection with work. Individual workplace participants may also be personally sued or subject to criminal charges if they engage in sexual harassment.

The sexual harassment laws prohibit sexual harassment against both men and women. Same-sex sexual harassment is also covered. Sexual harassment may involve a single incident of unwelcome behaviour or a pattern of unwelcome behaviour.

Sexual harassment does not have to be intentional to be unlawful. Sexual harassment does not have to be directed at a particular individual to be unlawful. Behaviour that creates a sexually hostile working environment for other workplace participants can also be unlawful (e.g., sexual jokes, comments, innuendo or sexually explicit conversations).

Sexual harassment is not behaviour that is based on mutual attraction, flirtation or friendship. If the behaviour is mutual, consensual, welcome and reciprocated, it is not sexual harassment. However, as set out in the *Code of Conduct*, workplace participants are prohibited from having a sexual relationship with a client/resident.

Examples of sexual harassment (but not limited to):

Work-related sexual harassment covers behaviour which takes place:

- At the normal workplace and during working hours;
- Off-site at work-related events such as conferences, seminars and functions, including client or supplier functions;
- Between workplace participants after hours, for example phone calls to their home, or posts on social media.

It is important to remember that it is the way the victim perceives the behaviour that is important in determining whether harassment has taken place, not the intent of the particular individual.

Examples of sexual harassment include but are not limited to:

- displaying pornographic literature in the workplace;
- offensive gestures;
- persistent or intrusive enquiries into someone's private life, sexuality, or physical appearance;
- requests for sexual favours;
- sexually offensive phone calls, messages on email, voicemail or in writing;
- staring or leering at a person or particular parts of their body;
- unwanted physical contact, touching, brushing against another person;
- verbal comments or abuse (e.g. persistent jokes or innuendos of a sexual nature);
- repeated requests to go out;
- displaying offensive screen savers, photos, calendars or objects;
- sexually explicit emails, text messages, or posts on social networking sites (see Social Media - Personal Use policy);
- stalking.

Racial Harassment

Racial harassment is also found in many forms. Examples include:

- abusive, threatening or insulting words and behaviour;
- deliberate exclusion from conversations;
- displaying abusive writing and pictures;
- insensitive jokes related to race;
- pranks.

What is not unlawful harassment

Reasonable management action taken in a reasonable way does not constitute harassment. This includes:

- setting reasonable performance goals and standards including work deadlines;
- reasonable work performance assessment, counselling, disciplinary and termination practices;
- rostering and allocating working hours where the requirements are reasonable.

Bullying

Bullying is repeated, unreasonable behaviour directed towards an individual or group that creates a risk to health and safety. Unreasonable behaviour means behaviour that a reasonable person, having regard to all the circumstances, would expect to victimise, humiliate, intimidate or threaten.

Bullying behaviour does not need to be based on a protected ground of discrimination. A person can be bullied for any reason. It may be that someone just does not like them.

For conduct to constitute bullying, it must be repeated. A one-off incident is not bullying. There is no requirement that the person deliberately or intentionally bullied the person, however, intention may be relevant in assessing the severity of the conduct.

Bullying in the workplace is unlawful. Maranatha House may be liable for bullying at work and so Maranatha House expressly prohibits bullying in connection with work. Individual workplace participants may also be personally liable and can face potential criminal charges if they engage in bullying.

Examples of bullying (but not limited to):

Some examples of behaviour that may be considered bullying, if it is unreasonable, repeated and creates a risk to health and safety, include but are not limited to:

- aggressive or frightening behaviour such as threats, harassment, swearing, shouting, intimidation or threatening violence
- spreading misinformation, malicious rumours and/or false accusations about a person
- rude, belittling or sarcastic comments e.g., “you’re hopeless”, “she’s on her way out”
- abusive, belittling or intimidating phone calls, emails, notes etc.
- baiting or unreasonable teasing (e.g., singing derogatory songs and inserting the person’s name, cruel nicknames)
- nasty practical jokes
- publicly belittling someone’s opinions or dismissing that person’s contribution without good reason, including in front of Residents and colleagues
- deliberate and unreasonable isolation or exclusion from work discussions, communication or other work-related activities (e.g., deliberately withholding work or information that is required for a worker to properly carry out their responsibilities)
- ignoring the person, innuendo or deliberate silence
- excessive and unreasonable work scrutiny
- abuse of management or supervisory power, such as:
 - inappropriate or unreasonable criticism of, or punishment about, someone’s work or behaviour
 - constantly and inappropriately changing and/or setting impossible deadlines, tasks or targets
 - setting tasks that are unreasonably below or beyond a person’s skill level
 - changing work arrangements, such as rosters and leave, to deliberately inconvenience a particular worker or workers
 - inappropriate or unreasonable blocking of promotion, training, development or other work opportunities
 - branding as a troublemaker a person who raises legitimate workplace grievances and taking no action to address the grievance.

Examples of what is not bullying

Low level workplace conflict is unlikely to constitute bullying. Equally, reasonable management action taken in a reasonable way will not constitute bullying. Reasonable management action may include:

- giving work directions and allocating work in accordance with business needs;
- counselling a workplace participant about their unsatisfactory work performance or conduct when undertaken in a reasonable manner;
- setting reasonable performance goals, standards and deadlines;
- rostering and allocating working hours where the requirements are reasonable;
- implementing organisational changes or restructuring;
- informing a workplace participant about inappropriate behaviour in an objective and confidential way; or
- transferring a worker for operational reasons.

Victimisation

Victimisation is where a person is retaliated against or treated detrimentally because they have lodged a complaint, they intend to lodge a complaint or they are involved in a complaint of unlawful conduct.

If a workplace participant feels they have been subjected to unlawful conduct, they are encouraged to raise the issue using the complaint procedure outlined in this Policy. Maranatha House will not treat a workplace participant less favourably in their employment because they have made a complaint. Further, workplace participants must not retaliate against a person who raises a complaint or subject them to any detriment. However, where a person lodges a false complaint in bad faith, that person may be disciplined.

Examples of victimisation (but not limited to)

- Excluding or isolating a person because they have lodged a complaint; or
- Failing to promote a person because they have lodged a complaint.

RESPONSIBILITIES OF ALL WORKPLACE PARTICIPANTS

Workplace participants should be aware that in some circumstances they can be held legally responsible for their own unlawful conduct. Workplace participants who aid, abet or encourage others to engage in unlawful conduct can also be liable for their conduct.

If a workplace participant observes someone else at work being subjected to unlawful conduct or conduct that is potentially in breach of this Policy, Maranatha House encourages them to report this conduct, particularly where it involves serious sexual harassment or bullying that creates an unsafe work environment. However, it is not the workplace participant's responsibility to confront the alleged harasser or bully.

All workplace participants are required to maintain confidentiality if they are involved in a complaint procedure. If a workplace participant breaches confidentiality, they may be subjected to disciplinary action. Spreading rumours or gossip may also expose a workplace participant to a defamation claim.

BREACH OF THIS POLICY

All workplace participants are required to comply with this Policy at all times. If a workplace participant breaches this Policy, they may be subject to disciplinary action. In serious or repeated cases this may include termination of employment. Board of Directors/Volunteers/Contractors who are found to have breached this Policy may have their contract with Maranatha House terminated or not renewed.

COMPLAINT PROCEDURE

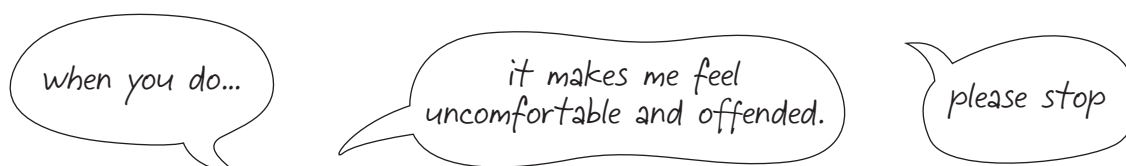
What a Workplace Participant Should do if They Have a Complaint

If a workplace participant feels they have been subjected to any form of unlawful conduct contrary to EEO laws or this policy, they should not ignore it. They should address the issue in accordance with Maranatha House's complaint procedure as set out below. Maranatha House encourages all workplace participants to raise issues under this policy, and will treat all complaints seriously. Accordingly, once a complaint is made under this policy, Maranatha House will deal with the matter appropriately in accordance with this policy.

If a workplace participant makes a false complaint in bad faith (e.g., making up a complaint to get someone else in trouble) that person may be disciplined. Such malicious complaints can also expose the complainant to a defamation claim. Further, if a workplace participant lodges an excessive number of complaints that Maranatha House determines to be unfounded, they may be disciplined.

How Do Workplace Participants Confront the Issue?

If a workplace participant feels comfortable doing so, they should address the issue with the person concerned. They should identify the offensive behaviour, explain that the behaviour is unwelcome and offensive and ask that the behaviour stop. It may be that the person was not aware that their behaviour was unwelcome or caused offence. For example, the workplace participant could say:



This is not a compulsory step. If a workplace participant does not feel comfortable confronting the person, or they confront the person and the behaviour continues, they should report the issue to a Contact Person.

How Does a Workplace Participant Report the Issue?

The workplace participant should report the issue to a Maranatha House Contact Person.

Each of the following people is a Contact Person:

- the workplace participant's manager/supervisor;
- CEO of the Maranatha House facility where the workplace participant is based.

Normally, the following will occur:

Discuss

The Contact Person will discuss the complaint with the workplace participant. They will explain the relevant steps that can be taken to address the complaint.

The Contact Person will generally need to meet with the workplace participant to discuss the complaint. The workplace participant can take a support person to the meeting if they want to.

Determine Complaint Process

The Contact Person will then determine the best way to deal with the complaint. There are two types of complaint procedures that can be used: informal and formal. The type of complaint procedure used will depend on the individual circumstances. In deciding on the best course of action, the Contact Person will consider the nature of the complaint and any other relevant factors.

What will the Contact Person do?

Given the nature of EEO complaints, and the need to maintain flexibility to resolve complaints, the action taken by Maranatha House will depend on the particular circumstances.

Is the Complaint Confidential?

The Contact Person will maintain confidentiality as far as possible. However, it may be necessary to speak with other workplace participants in order to determine what happened, to afford fairness to those against whom the complaint has been made and to resolve the complaint. If a complaint is raised and it appears that unlawful conduct potentially occurred, in order to uphold this Policy, Maranatha House will need to take appropriate action in relation to the complaint.

All workplace participants involved in the complaint must also maintain confidentiality, including the person who lodges the complaint. Spreading rumours or gossip may expose workplace participants to disciplinary action, and in serious cases may constitute defamation.

Workplace participants may discuss the complaint with a designated support person or representative. However, the support person or representative must also maintain confidentiality.

What Happens Under the Informal Complaint Procedure?

Under the informal complaint procedure there are a broad range of options for addressing the complaint. The procedure used to address the issue will depend on the individual circumstances of the case.

Possible options include:

- the Contact Person discussing the issue with the person against whom the complaint is made; and/or
- the Contact Person facilitating a meeting between the parties in an attempt to resolve the issue and move forward.

The informal complaint procedure is more suited to less serious allegations that may not warrant disciplinary action being taken. In the informal complaint procedure there is no decision made about what did or did not occur, but rather, the Contact Person attempts to facilitate an outcome that is acceptable to all parties, including Maranatha House.

What Happens Under the Formal Complaint Procedure?

The formal complaint procedure involves a formal investigation of the complaint. Formal investigations may be conducted by a Contact Person or a person from outside Maranatha House (including legal representatives), appointed by Maranatha House.

Where a complaint involves a disputed allegation that, if proven, may result in disciplinary action, it will generally be dealt with in accordance with the formal complaint procedure.

An investigation involves collecting information about the complaint and then making a finding based on the available information as to whether it is more likely than not the alleged behaviour occurred or did not occur. Once a finding is made Maranatha House will consider any outcomes arising from the investigation.

If Maranatha House considers it appropriate for the safe and efficient conduct of an investigation, workplace participants may be required not to report for work during an investigation. Maranatha House may also provide alternative duties or work during an investigation. Employees will be paid their normal pay during any such period.

How Long Does the Complaint Process Take?

As noted above, given the nature of EEO complaints and the need to maintain flexibility to resolve complaints, there is no set time frame for the complaints process. The Contact Person will commence the complaint handling process as soon as possible after a workplace participant has reported it. The complaint will be treated as a matter of priority in order to bring about a resolution as quickly as possible.

Possible Outcomes

The possible outcomes will depend on the nature of the complaint and the procedure followed to address the complaint. The procedures outlined below are intended as a guide only to the possible outcomes which may be implemented. In every case, the actual outcomes and/or disciplinary procedure to be adopted will be a matter for Maranatha House's determination and in consideration of the circumstances as a whole.

What are the Possible Outcomes if Unlawful Conduct has Occurred?

Where an investigation results in a finding that a workplace participant has engaged in unlawful conduct or breach of this Policy, that person may be disciplined. The type and severity of disciplinary action will depend on the nature of the complaint and other relevant factors concerning the workplace participant's employment, and may include (among other things):

- a formal warning
- counselling
- suspension/termination of employment.

Where the investigation results in a finding that the person complained against has engaged in serious misconduct, this may result in instant dismissal. Any disciplinary action is a confidential matter between the affected workplace participant and Maranatha House. Board of Directors/Volunteers/Contractors who are found to have engaged in unlawful conduct and/or breached this policy may have their contract with Maranatha House terminated or not renewed.

Are There Other Non-Disciplinary Outcomes?

Maranatha House may take a range of other non-disciplinary outcomes to resolve a complaint, depending on the particular circumstances.

Examples may include:

- training to assist in addressing the problems underpinning the complaint;
- monitoring to ensure there are no further problems;
- requesting an apology;
- requiring an undertaking that certain behaviour stop;
- changing work arrangements.

OPERATION OF POLICY

If a workplace participant is unsure about any matter covered by this Policy, they should seek the assistance of the Chief Executive Officer.

Maranatha House reserves the right to revoke or amend this policy at any time.

REFERENCES

FEDERAL

Racial Discrimination Act 1975 (Cth)
Sex Discrimination Act 1984 (Cth)
Disability Discrimination Act 1992 (Cth)
Age Discrimination Act 2004 (Cth)
Australian Human Rights Commission Act 1986 (Cth)
Fair Work Act 2009 (Cth)
Work Health and Safety Act 2011 (Cth)

NEW SOUTH WALES

Anti-Discrimination Act 1977 (NSW)
Work Health and Safety Act 2011 (NSW)

DECLARATION

I have read and understood the above Diversity, Inclusion & Respect in the Workplace Policy, and agree to comply with its provisions at all times while working in Maranatha House.

By signing this Policy I acknowledge my commitment to achieving the best outcomes for consumers and playing my part in ensuring that my working environment is safe and supportive.

Employee name:

Signature:

Manager name:

Signature:

Date:



CONTACT

Brendan Morris
General Manager
& CEO

Phone
T: 02 6845 3088

Online
E: manager@maranathahouse.com.au
W: maranathahouse.com.au