

GENERAL POLICY - CODE OF CONDUCT

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| <p>1. Policy Statement</p> | <p>This Code of Conduct affirms that SAE Institute Pty Ltd trading as SAE expects that all staff, students, Academic Board members, Governing Council members, Directors and Officers acting on behalf of SAE will adhere to the highest standards of professional conduct.</p> |
| <p>2. Purpose</p> | <p>All categories of staff and students at SAE are expected to carry out their work in an ethical and collegial manner, to perform their duties with efficiency, fairness, impartiality and honesty, and to comply with the provisions of this Code. Compliance with this Code will foster and maintain student, staff, and public trust and confidence in the integrity and professionalism of SAE. Staff are expected to promote and protect the interests of and maintain and enhance the reputation of SAE at all times.</p> |
| <p>3. Scope</p> | <p>This policy applies in the context of all SAE Institute Pty Ltd operations in Australia and its approved offshore delivery sites or branch campuses. It is applicable to all staff, officers and persons holding appointments with or employed by SAE in any capacity at all campuses and branch campuses, and all students enrolled with, or prospective students, of SAE irrespective of their place of residence, campus or mode of study.</p> <p>This Code should be read in conjunction with the approved policies of SAE. Failure to abide by the provisions of this code or approved policies of SAE may lead to disciplinary proceedings.</p> |
| <p>4. Associated Policies and Procedures</p> | <p>This policy should be read in conjunction with the following policies and procedures;</p> <ul style="list-style-type: none"> • Access and Equity Policy |
| <p>5. Associated Documents</p> | <p>Academic Quality This Code should be read in conjunction with the policies and rules of SAE and with the relevant State or Federal legislation, as appropriate and amended from time to time, which may include but are not limited to, for example:</p> <ul style="list-style-type: none"> • Anti-Discrimination Act 1977 (NSW) • Child Protection (Prohibited Employment) Act 1998 (NSW) • Copyright Act 1968 (Fed) • Crimes Act 1914 (Fed) • Crimes Act 1900 (NSW) • Disability Discrimination Act 1992 (Fed) • Equal Opportunity for Women in the Workplace Act 1999 (Fed) • Human Rights and Equal Opportunity Commission Act 1986 (Fed) • Occupational Health and Safety Act 2000 (NSW) • Occupational Health and Safety Regulation 2001 (NSW) • Privacy and Personal Information Protection Act 1998 (NSW) • Racial Discrimination Act 1975 (Fed) • Sex Discrimination Act 1984 (Fed). |
| <p>6. Policy</p> | <p>6.1 Respect for Law and Governance</p> <p>Staff and students of SAE are required to observe and comply with all relevant Federal and State laws, statutes and prescribed requirements (refer to associated documents section 4 for examples) as well as the policies and rules of SAE.</p> <p>6.2 Professional Conduct</p> <p>For staff, the professional conduct required by SAE includes, but is not limited to:</p> <ol style="list-style-type: none"> A commitment to professional standards in teaching and learning, research, administration and industry involvement; Observance and promotion of the rights of students and staff; Conduct which is professional at all times, and which has regard to the interests of SAE and the interests of students and staff; Awareness of relevant legislation and adherence to policies and procedures developed by SAE. <p>For students, the professional conduct required by SAE includes, but is not limited to:</p> <ol style="list-style-type: none"> A commitment to learning, appropriate methods of research, and appropriate behaviour at all times while on SAE premises or elsewhere as a student; |

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- b. Recognition and observance of the rights of fellow students and staff;
- c. Conduct which is fair and has regard to SAE interests;
- d. Awareness of relevant legislation and adherence to policies and procedures developed by SAE.

In conjunction with this code, students should also read, familiarise themselves with, and abide by the provisions of the Academic and General Polices.

6.3 Academic Freedom

SAE shall:

- a. Promote academic freedom of both inquiry and expression provided such inquiry and expression does not contravene applicable State or Federal legislation (such as defamation and privacy laws) and provided that if disputes arise, the provisions of this code and any relevant procedures are observed;
- b. Encourage students and staff to express themselves using critical judgement and scholarship, subject to confidentiality obligations placed upon them by any privacy and research obligations;
- c. Encourage officers and employees to express themselves using critical judgement and scholarship, subject to confidentiality obligations placed upon them by SAE either through defamation or privacy laws, policy or under the terms of their contracts of employment.

6.4 Respect for Individuals

All staff and students of SAE shall treat other members of staff and students as well as visitors and members of the community with respect, courtesy, fairness and equity. This involves, but is not limited to:

- a. Fairness in supervising and dealing with students and staff;
- b. Carrying out work with integrity and objectivity;
- c. Making decisions that are procedurally fair;
- d. A client-centred approach to work;
- e. Avoiding unlawful discrimination, for example on grounds such as: gender, sexual orientation, race, cultural background, religion, or political conviction;
- f. Avoiding behaviour which might reasonably be perceived as corruption, harassment, bullying or intimidation;
- g. Carrying out work in a safe manner and taking precautions to protect the health, safety and welfare of oneself and others;
- h. Complying with any legislative, industrial or administrative requirements;
- i. Avoiding behaviour which might reasonably be perceived as creating an unsafe or unhealthy environment, or constraining the legitimate rights of others;
- j. Respecting an individual's right to privacy and undertaking to keep personal information in confidence;
- k. Respecting privacy laws and confidential information given to them in the course of their employment or enrolment.

6.5 Conflict of Interest

Staff of SAE should be sensitive to the potential for conflicts of interest to arise between their personal interests and their duties, obligations and responsibilities to SAE, and shall take care to ensure that no actual conflict of interest arises.

Staff shall avoid situations in which their private interests (whether involving personal financial or pecuniary interests, or external associations, or personal and family relationships between staff or between staff and students) conflict with or might reasonably be thought to conflict with or influence judgements made during the course of their professional duties, and perceptions that an unfair benefit may have been attained. Potential conflicts of interest should be assessed in terms of the likelihood that a staff member possessing a particular interest could be improperly influenced, or might appear to be improperly influenced, in the performance of their duties on a particular matter.

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Academic staff have a particular responsibility to their students to assess their work fairly, objectively and consistently across the candidature for their particular unit or course. Because personal relationships between students and staff may involve serious difficulties arising from the unequal power of the parties concerned, as well as difficulties in maintaining appropriate boundaries between professional and personal life, academic staff have a responsibility to declare such potential or actual conflicts of interest to their supervisor as soon as they are aware of them.

Staff or students who believe they may be involved in, or that a potential situation of involvement may give rise to perceptions of, a conflict of interest, must inform and should seek advice from their supervisor or relevant Campus Manager or Campus Academic Coordinator, as the case may be, who will determine what action is to be taken. In the event of a conflict of interest involving Campus Managers or senior staff of the organisation or an external member of the Governing Council or its committees the member(s) must seek advice from SAE Managing Director and CEO or the Chair of the Governing Council as appropriate.

Members of staff should take particular care not to take part in the following matters in relation to any student with whom they have a personal relationship:

- i) selection for entry to any course where this depends on a judgement other than a pre-determined score or grade in which they have not been involved;
- ii) assessment procedures;
- iii) selection for any scholarship or prize;
- iv) postgraduate supervision.

Where a potential conflict of interest exists in relation to any student matters then the Campus Academic Coordinator or Campus Manager should approve alternative arrangements.

Failure to disclose a potential or actual conflict of interest by staff or students of SAE may render any associated decisions null and void, and may result in disciplinary proceedings.

6.6 Reporting Corrupt Conduct

Where reasonable evidence exists, staff and students are encouraged to report suspected corrupt conduct, as well as maladministration and serious or substantial waste of resources, to the Campus Manager or Campus Academic Coordinator, or National Academic Coordinator or CEO as appropriate. Privacy and confidentiality should be strictly observed in all such cases, and particular care must be taken to avoid vexatious or malicious allegations.

6.7 Outside Work and Private Practice

The employment obligations of staff who receive full-time salaries are to SAE as their employer. Full-time staff wishing to engage in outside work, including private practice, must seek approval to do so from the Campus Manager, who may approve or not approve such requests. Where a staff member wishes they may appeal such a determination to the CEO, whose decision shall be final.

All staff, including those employed for less than full-time, must not accept outside work where it may cause a direct or indirect conflict with their duties for SAE or otherwise adversely impact the conduct of their work or reflect poorly on the reputation and public standing of SAE, or where the possible work is for a competitor organisation. Any such potential direct or indirect conflict must be reported to the Campus Manager in the first instance.



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6.8 Duty of Care and Safety

Employees are required at all times to work safely and to observe all safety procedures. The staff and students of SAE must take every precaution reasonable in the circumstances to protect the health, safety and welfare of all those in the workplace. In particular, they must comply with the relevant State and Federal legislation and relevant Codes of Practice as well as specific SAE Workplace Health and Safety policies and procedures. Staff and students should also actively promote safe working practices and environments for everyone using SAE facilities.

Staff should ensure that their personal behaviour does not affect work performance or the health, safety and welfare of others, especially students in their care. Relevant staff should take steps to ensure that all contractors engaged on site are aware of SAE WHS Act obligations and are compliant with Occupational Health and Safety policies and procedures.

6.9 Discrimination and Harassment

Staff and students of SAE must not harass or discriminate against their colleagues, students, members of the public or other persons with whom they may interact on the grounds of (including but not limited to) sex, marital status, pregnancy, age, race, ethnic or national origin, physical or intellectual impairment or sexual preference. Such behaviour may constitute an offence under several Federal Anti-Discrimination laws as well as the State Anti-Discrimination laws and will be considered a serious breach of policy. In addition, staff and students must not harass or discriminate on the grounds of political or religious convictions.

Managers and Coordinators must make every effort to ensure that the workplace is free from all forms of harassment and discrimination. They should understand and apply the principles of equal employment opportunity and ensure that the employees they supervise are informed of these principles.

6.10 Diligence

Staff are expected to be diligent in their work and to carry out their duties in a professional, responsible, and conscientious manner, and to be accountable for their official conduct and decisions. They have an obligation to carry out official decisions and adhere to policies faithfully and impartially.

All employees of SAE are expected to maintain and enhance their skills and expertise and keep up-to-date the knowledge associated with their particular field or area of work. High standards of performance and a keen focus on client service are expected.

6.11 Confidential Information

Official information must only be used for the work-related purpose intended and not for personal benefit. Officers and employees must make sure that they do not disclose, disseminate or make use of any information marked confidential without prior authorisation or unless specifically authorised by legislation.

All staff of SAE must take reasonable steps to ensure that any information marked confidential in any form (e.g. computer files), cannot be accessed by unauthorised people and that sensitive information is only discussed with people who are authorised to have access to it. Unauthorised disclosure or use of confidential information may result in disciplinary proceedings for misconduct.

6.12 Use and Security of Personal Information

All staff have a duty to maintain the confidentiality, integrity and security of information for which they are responsible. In addition, staff of SAE have an obligation to:

- (a) ensure that personal information concerning students or staff is secured against loss, misuse or unauthorised access, modification or inappropriate disclosure;

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- (b) report to their supervisor, or the Campus Manager, actual or suspected misuse of information.

6.13 Computer usage

SAE provides computing, internet and email facilities for work purposes, which should at all times be used in a responsible manner, and in compliance with the relevant SAE policies as well as relevant applicable legislation.

SAE will not allow excessive or unreasonable personal use of SAE computers and computing systems, and a Campus Manager with approval of the CEO may at any time initiate an audit of SAE email and data files.

6.14 Viruses

Any staff members or students that receive any email or files from someone they do not know, or any email or files which may give rise to concern, should not open them, but should contact their supervisor or lecturer or the System Administrator (or as a last resort the Campus Manager) immediately.

6.15 Unacceptable Use of Internet/Email/Computers

The use of SAE computers, internet and email facilities for the following purposes is expressly prohibited:

- a. Distribution or saving of material that is illegal in Australia or country of destination
- b. Distribution or saving of material that negatively reflects upon a particular race, gender, religious belief, nationality, marital status or sexual orientation, or is likely to cause offence.
- c. Distribution of copyright material without permission of the author(s).
- d. Distribution of material that may negatively reflect on SAE's reputation, or the issuing of any unauthorised statement as being attributed to SAE.
- e. Carrying out or attempting to carry out impersonation, misrepresentation of identity, forgery, substitution of mail, headers or any other identification marks.
- f. Using SAE computer systems for gambling or soliciting for personal gain or profit.

6.16 Security of Data

Staff members must not send, pass on or provide access to any confidential SAE material to unauthorised persons. All document and mailing addresses must be checked before email is sent to avoid mistakes or inappropriate disclosure of information.

6.17 Security Maintenance

Staff and on-site contractors must maintain adequate security of SAE in which they are working and must maintain security of keys and swipe cards issued to them for the purposes of opening, accessing and using buildings, vehicles, equipment and other facilities. Keys and access devices are to be used only in the performance of approved and scheduled duties, and use for any other purpose requires the prior approval of the Campus Manager.

6.18 Property

Unauthorised possession, unauthorised usage or unauthorised removal or relocation of SAE property or the property of other persons without authorisation or permission is strictly prohibited.

Note: All serious cases, particularly those related to unauthorised possession of property, will be referred to the Police. Any disciplinary action SAE Institute Pty Ltd may take is quite separate from, and additional to, any action the Police may choose to take.

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6.19 Attendance

Staff who are not able to attend work for any reason must make all reasonable effort to advise their manager or supervisor before their starting time on any day of absence. The manager or supervisor must be advised of the reason for the type of absence and the expected date of return to work.

Absences due to sickness longer than one day will normally require presentation of a medical certificate.

Where it is deemed appropriate by SAE, staff may be required to comply with procedures regarding recording of attendance.

6.20 Alcohol and Prohibited Drugs

No alcohol is to be consumed on SAE premises without the express approval of the Campus Manager.

No prohibited drugs are to be brought into SAE premises, and any staff member so involved will be liable to summary dismissal.

Employees on prescription drugs which may impair their personal safety, or the safety of other persons, should report the matter to their manager or supervisor to allow a proper evaluation to be made.

Any staff member who is suspected of having consumed alcohol or prohibited drugs or who, in the opinion of their manager or supervisor, is not capable of satisfactorily performing normal duties, will be stood down without pay, pending further investigation and disciplinary action.

6.21 Smoke Free Workplace

By law all workplaces must be smoke free. All staff and students must observe this requirement. Any rules relating to outdoor smoking areas, or areas near entrances or exits must be adhered to.

6.22 Media Statements and Social Media Networks

Statements to the media or to media representatives or public statements relating to any aspect of SAE operations or business are prohibited without the express approval of the CEO or the relevant delegated manager.

Staff are advised to exercise caution in making statements about their paid work or about SAE and its operations on social media and networking sites, as in some cases such statements may constitute a publication in legal terms and may be the basis for formal action taken against the staff member or SAE.

6.23 False Declarations

Wilfully making false declarations is strictly prohibited and will be subject to disciplinary action.

6.24 Breaches

Any breach of this Code of Conduct may result in a decision by the CEO to instigate a misconduct investigation and disciplinary action, and a serious breach of any of the provisions of this Code by a staff member may result in summary dismissal.

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| 7. Records | <table> <tr> <td>13 July</td> <td>2007 policy implemented (approved Governing Council)</td> </tr> <tr> <td>9 September</td> <td>2009 policy amendment (approved by the chair, Governing Council)</td> </tr> <tr> <td>2 December</td> <td>2010 policy approved (Governing Council)</td> </tr> <tr> <td>28 February</td> <td>2011 policy approved (CEO & Managing Director)</td> </tr> <tr> <td>1 July</td> <td>2013 Policy to be reviewed</td> </tr> </table> | 13 July | 2007 policy implemented (approved Governing Council) | 9 September | 2009 policy amendment (approved by the chair, Governing Council) | 2 December | 2010 policy approved (Governing Council) | 28 February | 2011 policy approved (CEO & Managing Director) | 1 July | 2013 Policy to be reviewed |
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Approved By : Mr Joseph Anthonyysz, Managing Director & CEO
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