



Message from Executive Committee

Whether you are a long serving member of our team or a new addition, The Cockburn Way will help you understand who we are as a team, what motivates us and what behaviours are expected and encouraged at Cockburn.

Making good decisions and choices builds trust between our teams and the community we serve. But not all situations are straight forward. The Cockburn Way serves as a guide to help you navigate tricky situations and know who to ask for help.

Our relationships and interactions with each other are founded on being the BEST – Benevolent, Empathetic, Safe and Trustworthy.

These four pillars guide our behaviours, reinforce our culture, and help us make good choices, so that we can make Cockburn the BEST place to work.

As the Executive Committee (aka ExCo) we are committed to The Cockburn Way. From the way we lead, the decisions we make and how we empower our teams. The Cockburn Way applies to all of us – regardless of your role, location of work or hours of work – we are all valued members of this team who can hold each other accountable and support each other in the way we work.

It takes all of us working together to create a culture that makes Cockburn the best place to work, and that includes you.





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Part 1 – The Code

A building block of our culture is centred on how we treat each other. That means irrespective of role or background, contributing to making our organisation the best place to work means being the BEST.

These are the four cornerstones of The Cockburn Way.



Benevolent

“Every action you take is a vote in the person you want to be.” – James Clear

Benevolence sounds exotic but is simple – it means having good intentions and being kind.

The Cockburn Way speaks to an obligation that we have to each other to exemplify whole-hearted, genuine, good actions that benefit the people around us.

The Cockburn Way looks like:

- Seeking to understand the perspective of colleagues
- Listening and sharing information regularly
- Expressing opinions clearly and with care
- Reflecting on the ethical consequences of decisions
- Giving people an opportunity to rethink, adapt or move on from their position.

We cultivate benevolence daily. Each interaction is a decisive moment – a moment to recognise our team member’s emotions, opinions, qualities, and faults – and act with good, kind intent.



Q – My team member is pushing for a decision that I do not agree with. They have raised it multiple times and will not let it go. I am feeling frustrated that they will not let it go. I do not know what to do to make them listen.

A – Seek to understand. Ask them to share why they believe so passionately about this perspective and what their expectations are around the decision. You may find they will share more details you may not have earlier known. Clearly explain your perspective and provide an opportunity for you both to rethink how you approach the situation. You may be able to compromise or find an alternative. If not, giving someone the respect of truly listening to their perspective will ensure they know you are acting with good intent, even if you disagree.



Q – I have noticed the same people will always speak in our team meetings. They are usually the most extroverted team members who steer the conversation. One of my teammates is introverted and will often share their insights, but I know they have lots to contribute (they share openly in one-on-one meetings).

A – Create opportunities that are more inclusive and allow this person to speak up. Consider asking the meeting coordinator to practice turn-taking during discussions. This includes allowing everyone an opportunity to speak (try doing a round table) and encouraging the team to actively listen to the person speaking (not interrupting, making eye contact, repeating your interpretation of what has been said to ensure understanding). Allowing everyone the opportunity to speak shows people they are seen, heard, and valued.



Empathetic

“Empathy is not connecting to an experience; it is connecting to the emotions that underpin the experience.”
– Brene Brown

The Cockburn Way speaks to acknowledging that in bad moments our job is not to make things better but to connect (through feeling with the person) by understanding their perspective.

The Cockburn Way looks like:

- Honouring people’s perspectives even when they are different from ours. We cannot practice empathy if we need to be knowers; if we cannot be learners, we cannot be empathic
- Being nonjudgmental
- Being comfortable with emotions so that we can understand emotions in others and communicate our understanding of them
- Paying attention to what is happening in our conversations, to the feelings they are bringing up in me, to my body language, and to the body language of the person I am talking to.



Q – My teammate is struggling with all the change happening in the organisation. Sometimes they are angry or get cynical about our workplace and can be extremely negative.

A – Change is hard, and we all deal with it differently. Some of us thrive off the ambiguity whilst others feel scared of the unknown. Your job is not to fix how they are feeling, it is to sit with them during the discomfort. Empathy is the practice of listening to someone and reflecting their experience, not taking on their problems. You do not have to walk in their shoes, rather believe, listen and stay curious about their experience.



Q – My teammate is having a tough time at work after the loss of a loved one. Their moods will often swing from anger to sadness, and it is hard to know how to support them at work or what the right thing to do or say is.

A – Coming back into the workplace after loss is extremely difficult. When you do see them ask them how their day has been and then listen. You do not need to offer advice or tell them it will all be okay or try to find solutions to their grief. Showing empathy in this situation is letting them know they can talk about their emotions without fear of judgement.

Empathy is a hard skill to learn because proficiency requires practice, and practice means making mistakes along the way. So, we commit to practice empathy, screw it up, circle back, clean it up, and try again – all so we can have the BEST place to work in.



Safe

“A culture of safety is a journey, not a destination. It requires our continuing diligence.” – Rear Admiral Terry J Moulton

The Cockburn Way speaks to the power of people feeling confident that they will be kept safe at work – psychologically and physically.

Psychological safety

“Organisations are more at risk of preventable business failures or human safety failures when psychological safety is low.” – Amy Edmondson

Picture this scenario – an employee has an innovative idea that could solve a complex problem that people in the business unit have been scratching their heads about for months, but they choose to stay quiet.

Now picture this scenario – an employee working in the production line at an aircraft company notices that issues with equipment delays are resulting in an increase in defects. This means the aircrafts are unfit for use. In this instance, the employee does voice their concerns, but is brushed aside.

These two scenarios provide an insight into how varied the impacts of a lack of psychological safety can be at work. In the first scenario, the organisation is missing an innovative idea and wasting valuable resources. In the second scenario, people’s lives are put at risk.

The Cockburn Way means that these scenarios, or similar, do not happen where we work because people feel psychologically safe to raise the idea and/or act on the concern being raised.



Q – I have recently graduated and attended a project meeting. I shared some of my ideas from uni and work experience with the team. A more experienced member of my team made a comment in the meeting about my eagerness to contribute to the meeting when I had the least experience out of all the attendees. Should I not have spoken?

A – This behaviour may be considered as bullying, and at a minimum is disrespectful and inconsistent with our Code. Speak up. You can email best@cockburn.wa.gov.au for further guidance.



What is psychological safety?

The Cockburn Way acknowledges that in today's world our staff need to take interpersonal risks to do excellent work. That means speaking up with an idea, asking a question, feeling safe to own up to mistakes or sharing concerns before something develops into a problem.

Psychological safety describes an environment where our staff believe that they can do these things without negative repercussions. It is a recognition that I, as my fallible self, can work here, be with these other people and do my best.

As a people leader, The Cockburn Way of enabling a psychologically safe environment looks like:

- Acknowledging that you are okay with a psychologically safe approach might mean work takes a little longer to complete, as teams pause periodically to evaluate or invite other perspectives
- Being mindful, in the heat of the moment, that no one wants to do a bad job
- Owning up to your knowledge gaps and/or admitting to mistakes so that your people feel safe enough to do the same
- Getting people to have a shared understanding of what is involved with a task or activity so that it can clarify why other people's voices matter.

Being aware that your initial reaction when someone comes to you with a mistake really matters and sets the tone for future interactions not only with that person but any bystanders or teammates they speak with.

And in general, a psychologically safe environment looks like:

- Communicating across the structural hierarchy of the organisation, with anyone in the organisation, anytime
- Owning their mistakes, apologising, and making amends
- Seeking feedback or when asked for feedback providing it honestly and respectfully

- Raising problems and tough issues constructively
- Being enabled to take risks because you have done the planning
- Requesting help and having your requests being appreciated, especially when they come before it is too late
- Sharing their ideas and concepts early and often
- Respecting other people's boundaries, and when they are not clear about what is okay and not okay, they are asked. People are also willing to say no
- Do what they say they will do (meaning that we will stay aware of our competencies and limitations, so we do not overpromise and are able to deliver on commitments and balance competing priorities)
- Knowing that your confidences are going to be kept and that you are not sharing confidential information with others
- Knowing that you can talk about how you feel without judgement and that others can talk about how they feel knowing that you will withhold judgement
- Extending the most generous interpretation possible to the intentions, words, and actions of others.

Transformation and innovation

“If you don’t try to uncover what is unseen and understand its nature, then you will be ill prepared to lead.”

– Ed Catmull

Transformation and innovation offer opportunities to keep improving what we offer to our community. If we want to be the best place to be then our ability to transform and innovate will be key indicators of success. In this context, transformation and innovation done The Cockburn Way looks like:

- Being curious about the organisation and about your customer
- Being ready to challenge the status quo when latest information suggests that there is an opportunity to be leveraged. Asking ‘why?’ is encouraged
- Sharing information early and often
- Knowing when to consider options and knowing when to move quickly to test an idea. We are comfortable with prototyping
- Being comfortable with mistakes made with the right intent
- Teamwork rather than a one-person show.

Physical safety

The airline scenario mentioned provided an opportunity to reflect on the work our people do and the singular importance of ensuring that they return home safely. The opening quote of this section refers to a culture of safety requiring careful and persistent effort.

The Cockburn Way, in the context of our safety, requires our persistence in making certain that we are always safe in so much as we:

- act and work safely
- do not abuse substances
- are anti-violence
- are anti-harassment/anti-discrimination.

These areas are covered in more detail in the following pages.



Q – My People Leader has a habit of sharing confidential information. During a recent recruitment process, they spoke about the applicants and shared a list of internal applications with members of the team.

A – This behaviour is disrespectful and inconsistent with our Code. We expect confidentiality to be upheld, especially during a recruitment process. You can talk to your People Leader about how this makes you feel and how damaging sharing information is to trust and respect. You can also speak with the grievance support team at best@cockburn.wa.gov.au for further guidance. The expectation is the People Leader will own their mistake of sharing confidential information, apologise and not make this mistake again.



Act and work safely

At the City of Cockburn, we are committed to safeguarding the health and safety of our employees, visitors, contractors, customers, and communities.

The Cockburn Way means that you must:

- Follow all health and safety policies and procedures whether at our facilities, or on the road
- Speak up and raise a concern when:
 - A task you consider unsafe or harmful to the environment is assigned to you
 - A job you think you are not trained to perform and that may harm you or others or the environment is assigned to you
 - Someone is performing a task that you believe is unsafe or harmful to the environment or that the person is not trained to perform
 - A vehicle or piece of equipment is not operating properly and may be unsafe
 - An unsafe condition or a potential danger to yourself, others or the environment comes to your attention.

In observing the above, you are also acknowledging that health and safety is everyone's responsibility.

Substance abuse

At the City of Cockburn, part of building and maintaining trust with others is acknowledging that working under the influence of drugs or alcohol poses an unacceptable safety risk to yourself and others. Drugs may include illegal drugs, controlled and/or certain legal substances or misused prescription medication.

The Cockburn Way means that you must perform your duties free from the influence of any substance that could impair job performance.

In observing the above, you are also acknowledging that the following is considered substance abuse and is prohibited as part of The Cockburn Way:

- Working under the influence of alcohol or drugs on or off City of Cockburn premises
- Possessing, selling, using, transferring, or distributing illegal drugs or controlled substances while working or on the premises
- Working while impaired by a lawful drug, prescription medication or over-the-counter drug.

In observing the above, you are also acknowledging that whilst not considered substance abuse, staff consuming any alcohol during working hours or at work related meetings with Councillors is prohibited.

The exception to the rule is at a designated function authorised by the CEO. In this instance if alcohol is consumed employees are not permitted to return to work and must drive responsibly.

Seeking assistance with substance abuse, misuse, and addiction

If you are concerned about your use of substances, you are encouraged to seek assistance. Contact the City's Employee Assistance Program for support.



Anti-violence

There is a zero-tolerance for workplace violence at the City of Cockburn.

The Cockburn Way means that you must never:

- Engage in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats, or any expressions of hostility, intimidation, aggression, or hazing
- Possess weapons in the workplace. This prohibition extends to City of Cockburn parking areas as well as our facilities, to the full extent permitted by law.

The City's zero-tolerance policy for workplace violence applies to the behaviour of all our employees as well as third parties. This includes visitors, on City of Cockburn premises, as well as to the behaviour of our employees, customers, vendors, suppliers, and temporary personnel engaged in City of Cockburn business.

In observing the above, you are acknowledging that workplace violence also includes any violent act by a third party against a City of Cockburn employee who is conducting business on behalf of the City of Cockburn. You have an obligation to speak up and report unusual or concerning behaviour, threats, or potential violence immediately to your People Leader or People Experience Team.

Anti-harassment/Anti-discrimination

There is a zero-tolerance for workplace harassment/discrimination at the City of Cockburn.

At the City, we believe that everyone should have the opportunity to reach their full potential and contribute to our organisation's impact.

The Cockburn Way means that you must:

- Never discriminate or treat employees or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation, or any other term or condition of employment
- Make employment decisions regarding employees and applicants based on job-related factors, without regard to race, colour, age, sex or gender, sexual orientation, gender identity, gender expression, transgender status, religion, creed, national origin, ethnicity, citizenship, ancestry, disability, genetic information, military or veteran status, pregnancy, marital or familial status, or any other protected category under applicable law
- Never engage in workplace harassment, which includes unwelcome verbal, visual, physical, or other conduct of any kind that causes others to feel uncomfortable or creates an intimidating, offensive or hostile work environment.



Q – I have been at Cockburn for a few years now. There is an opportunity for me to apply for a leadership role, and I am pregnant. My Senior Leader has told me I should not apply as they need someone who can commit to the role, and I should focus on my baby.

A – This is discrimination. You should never be discriminated against because you are pregnant. The assessment of your ability to do the role is based on your experience, qualifications, and leadership potential.

If you feel comfortable, speak with your Senior Leader about why you feel their comments were discriminatory. You are also encouraged to speak with your People Experience Business Partner to ensure your application is assessed on its merit and not your personal circumstances.



Any of the non-exhaustive list below is in contravention of The Cockburn Way:

- Sexual harassment
- Offensive language, jokes, or degrading comments
- Racial, ethnic, gender or religious slurs
- Intimidating or threatening behaviour.

In observing the above, you are also acknowledging that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions.

What is sexual harassment?

Sexual harassment may consist of verbal, visual or physical conduct of a sexual nature that is unwelcome and that a reasonable person would find offensive. It can take many forms, such as:

- Sexual advances, requests for sexual favours or unwelcome demands for dates
- Sexually oriented jokes, pictures, texts, or email messages
- Explicit or degrading comments about appearance
- Display of sexually suggestive pictures or pornography.



Q – After work, I attended a gathering with the rest of my team. One of my teammates made several unwelcome advances towards me. What should I do?

A – Unwelcome advances are never acceptable. If you are comfortable doing so, professionally, and respectfully address the situation with the person involved, and know that going forward, you can always do so in the moment. You should also speak up and consult best@cockburn.wa.gov.au so that additional steps may be taken consistent with established processes.



Trustworthy

“Trust is built when someone is vulnerable and not taken advantage of.”
– Bob Vanourek

Without trust, we have nothing. With it, we can do wonderful things.

The Cockburn Way speaks to the diligence of building and maintaining trust with each other; in our accountability; and in how we look after what is ours – by many small actions over time.

In doing this we believe that building trust is not a matter of technique, tricks, or tools but of character – a way of being.

Build trust with each other

We aspire to being the best place to work. A crucial part of this is a work environment where everyone feels valued and respected for their contributions, where they have each other’s backs and are free from intimidation and harassment. You must do your part in helping to create this environment.

Embrace diversity, equity, inclusion and belonging

At the City of Cockburn, we define diversity by both visible characteristics – like race, gender, and ethnicity – and by the invisible qualities and influences that truly define who we are and make us unique – personality, lifestyle, thought

processes, work experience, age, education, socioeconomic background, sexual orientation, gender identity, religious affiliation, military service, disability status, family history, community associations and other factors.

The Cockburn Way means that you must:

- Ensure equal employment opportunity
- Advance diversity, equity, and inclusion
- Respect the dignity and human rights of all people
- Do your part in creating a work environment where everyone feels valued and respected for their contributions and is free from intimidation and harassment
- Speak up and/or call out behaviour not in line with The Cockburn Way.

We do our job

When you work for the City of Cockburn, you step up to the challenge of that role knowing that every position truly is as important as any other in any team. Each day, The Cockburn Way, looks like all of us putting others and things that are bigger than ourselves first by doing our jobs as per our job descriptions with accountability and humility.



What is a microaggression?

Microaggressions are defined as the everyday, subtle, intentional – and oftentimes unintentional – interactions or behaviours that communicate some sort of bias toward historically marginalised groups. A microaggression is about impact, not intention. It is often difficult to dissect and articulate why it may be offensive.

These can include:

- Someone commenting on how well an Asian Australian speaks English
- Presuming that a person of colour is dangerous or violent
- Telling a woman not to be too emotional or aggressive
- Endorsing heteronormative culture – denying use of a person’s pronouns or chosen name.

If you feel you are subjected to a microaggression, speak to the person who made this statement/acted in this way about why it is not appropriate and the impact this has. If you do not feel heard reach out to a member of the grievance support team at best@cockburn.wa.gov.au.



Q – I asked my People Leader for flexibility in my working hours so my partner and I could better juggle care requirements for our son. I outlined how I would manage my workload and not have an adverse impact on the team. My People Leader made a comment about it being my wife’s role to be at home with the kids and it’s easier for her given she already works from home.

A – This is a microaggression and not in line with the Code. Caregiving is not restricted to mothers/females/primary caregivers/birth parents. Parents should not have to explain why they need to take care of their children or why their ‘wife’ cannot take care of the children. If you feel comfortable speak with your People Leader about the sexist nature of this comment. You can also contact best@cockburn.wa.gov.au.



Q – I am going through gender affirmation and have a new name badge with my pronouns and my new name. My People Leader refuses to use my new name and correct pronouns even though I wear my name badge and have communicated this to the team.

A – This is a microaggression and not in line with the Code. We want our teams to show up as their true selves at Cockburn. You have every right to ask that people stop referring to you by your dead name (a name that you no longer want to use) and incorrect pronouns. If you do not feel comfortable speaking up reach out to your allies or email best@cockburn.wa.gov.au.



Q – I was in the staff kitchen having a casual conversation with some staff, when one of them made a comment about another teammate’s heritage. Everyone, including the person this was targeted towards laughed, however I found it offensive. How do I handle this situation?

A – Check in with the team member who this comment was directed at and ask how they feel. They may not be offended but that does not mean you cannot be offended. Be an ally. If you are comfortable doing so, professionally address the situation with this person, by letting them know how their comment made you feel and why it may be hurtful to others.

If you do not feel comfortable addressing the situation yourself, need guidance, or you are concerned that additional steps should be taken, then you should email best@cockburn.wa.gov.au.

Demonstrate accountability

In line with our vision, we aspire to be the best organisation to do business with. A crucial part of this is being synonymous with integrity in how we fulfill our legislative function and conduct our business. It is up to all of us to make this happen.

To demonstrate accountability, The Cockburn Way means that we:

- Build and foster transparent relationships
- Are anti-bribery/anti-corruption
- Do not engage in inter-office relationships where there is a power imbalance (relationships between Leaders and direct reports are not allowed)
- Identify and manage conflicts of interest
- Are responsible with gifts, meals, and entertainment
- Are responsible with social media.



Q – My neighbour has been shortlisted for a job at the City. I am on the interview panel but haven’t disclosed that they are my neighbour. We aren’t friends, so I didn’t think I needed to.

A – This may be perceived as a Conflict of Interest. It is best to always disclose any relationships with potential employees, close or distant, if you are on an interview panel. You can read the City’s Conflict of Interest Guidelines and Policy found in ECM and should speak with the Governance team for further direction.



Build and foster transparent relationships

Our ratepayers, residents, customers, members, suppliers, key stakeholders, and other business partners place trust in our decision making and our services and we are determined to live up to that trust.

In this context, The Cockburn Way means that you must:

- Always be honest
- Make sure you understand your responsibilities
- Conduct your relationships fairly, positively, and productively based on mutual respect and trust
- Avoid anything that even looks like a possible conflict of interest
- Effectively manage any perceived conflict of interest
- Not offer or provide anything to anyone in exchange for an advantage for the City of Cockburn or you
- Hold a supplier, business partner or key stakeholder accountable for any violations that you see or suspect
- Follow our procurement policy and practices in selecting suppliers if you are involved in sourcing goods and services for the City of Cockburn

- Make sure that we meet our contractual obligations if your work involves managing a contract
- Cooperate fully with any state or federal government inspections, investigations, or requests for information, making sure that you understand the rules and regulations that apply to you and that any information you submit on behalf of the City of Cockburn is accurate and truthful.

In observing the above, you also acknowledge that building and sustaining relationships is an ongoing process that requires enduring commitment to lofty standards of personal conduct which can be seriously damaged through just one deceptive or dishonest act.



Q – During a call with a customer, my co-worker provided inaccurate information to them. I am hesitant to contact them because I do not want them to think we are dishonest. What should I do?

A – It would be a violation of our Code of Conduct to deliberately leave out essential information. Speak with your co-worker first to understand why they shared inaccurate information – was it a genuine mistake or intentional? You and your co-worker should reach out to the customer immediately and correct any mistakes. While the customer may be unhappy that they received the incorrect information initially, your honesty will be appreciated, and you will be maintaining the City’s reputation and integrity.



Are anti-bribery/anti-corruption

By conducting our jobs responsibly, we will become synonymous with integrity. Any form of corruption in any work-related dealing is prohibited at the City of Cockburn.

The Cockburn Way means that you must:

- Be responsible for understanding how to identify and avoid all forms of corruption
- Never accept anything of value that might affect your objectivity in doing your job
- Never offer or give a bribe to anyone as part of your work-related dealings
- Never offer, directly or indirectly through a third party, anything of value (this includes not only cash, but also gifts, hospitality e.g., travel, meals and entertainment, donations and sponsorships, or anything else that could be valuable to a recipient) to improperly obtain or retain business, influence decisions, or secure an unfair business advantage
- Not make facilitating payments to government or elected officials
- Promptly report any suspected bribery, demands for a bribe, or the actual payment of a bribe made under coercion directly
- Promptly report any suspected blackmail, threats of potential blackmail, or actual actions or decisions made under actual blackmail threats.

Identify and manage conflicts of interest

We expect that you are acting in the best interests of the City of Cockburn when performing your job. At the City of Cockburn, conflicts should be avoided, or an appearance of a conflict, between your personal interests and the City of Cockburn's interest.

The Cockburn Way means that you must:

- Recognise, avoid, and disclose any real or potential conflicts of interest that can interfere with your ability to make objective business decisions, especially when personal relationships, outside employment or investments are involved
- Understand and follow the City's Conflict of Interest Guidelines and Policy.

In observing the above, you also acknowledge that conflicts of interest may arise when you:

- Engage in activities that compete, or appear to compete, with the City of Cockburn's interests and/or undermine, or appear to undermine, the City's ability to fulfill its governance role
- Let your work-related decisions be, or be perceived to be, influenced by personal or family interests or friendships
- Use a City of Cockburn work-related opportunity, property, information or resources for personal benefit or the benefit of others

- Hire, supervise, or have a direct or indirect line of reporting to a family member, romantic partner, or close friend, or can influence that person's employment opportunities or compensation
- Have outside activities or employment that are disclosed or not that negatively affects your job performance or interferes with your City of Cockburn responsibilities
- Work for, provide services to have a financial interest in, or receive any personal benefit from a current or potential supplier, customer, or competitor, or have a family member who does.

Finally, notwithstanding the above, a conflict of interest is not necessarily wrong or unethical. It is the prompt and honest identification and management that is important. For this reason, the City's Conflict of Interest Guidelines and Policy must be understood and followed.



Q – I have learned that the City of Cockburn is working on a tender package. My brother’s company just lost a big job and really needs the money to keep the business afloat. Since it will not benefit me personally, can I tell him about the details of the tender before it gets published so he can do advance work to respond to it?

A – No. Letting anyone know about the details of a tender before it is published is a violation of the Code of Conduct. Do not share the information with your brother or anyone else. If you have additional questions, you should contact best@cockburn.wa.gov.au.

Are responsible with gifts, meals, and entertainment

The exchange of gifts and entertainment is nothing new in business. They are reasonable ways of expressing gratitude and sustaining relationships. It is when gifts create pressure for the recipient to return a favour or feel indebted to the giver – with decisions that benefit the giver and create a conflict of interest or perception of a conflict of interest. At the City of Cockburn, we do not exchange gifts or entertainment that look like an attempt to improperly influence any decision.

The Cockburn Way means:

- Only accepting a gift when it is:
 - Modest in value
 - A token item like a pen, t-shirt, or logo branded item
 - Symbolic, like a modestly priced, inscribed trophy or statue
 - Approved for a large group of staff
- Only accepting occasional, reasonably priced meals or entertainment if the giver also attends
- Not accepting a gift when it is:
 - Given in exchange for some action
 - Any value of cash or a cash equivalent, like a gift card or gift certificate
- In the form of stocks or securities
- More than modest in value
- Not available to others, like a special discount
- In observing the above way of not accepting a gift, the City of Cockburn acknowledges that sometimes it can be difficult to refuse a gift, especially if you are worried about insulting the giver or if you have been presented with a gift in front of a group. If you cannot decline the gift, The Cockburn Way means accepting it, but immediately notifying your People Leader, who will work with you to donate, distribute, or raffle it among a large group of employees
- Never requesting gifts, meals, entertainment, or favours from third parties
- Always communicating your responsibilities regarding gifts with the giver to help prevent similar situations in the future
- Only providing a gift, meal, or entertainment to a work-related contact if it supports a legitimate work-related purpose, is reasonable and appropriate and if approved.



Q – A supplier I work with knows that I am an avid cyclist. Before the holidays, they sent me cycling equipment and clothing to use. This supplier has worked for the City of Cockburn for many years with reliable results, and everyone wants to continue the relationship. Can I accept the gift?

A – No. A gift of this nature is lavish and clearly beyond what would be acceptable. It creates the appearance that we make decisions based upon what is given to us personally rather than what is best for the City of Cockburn. Therefore, the gift must be returned, and People Leader is notified.

Are responsible with social media

At the City of Cockburn, we expect you to be mindful that posting to social media channels about work-related content can result in unintended consequences that could impact both you and the City of Cockburn.

Being responsible with social media, The Cockburn Way means that you:

- Understand and comply with the City of Cockburn’s Social Media Policy when active on social platforms for business, or when using social media for personal activities if you have identified yourself as a City of Cockburn employee and/or are using City of Cockburn equipment or systems
- Do not misrepresent yourself or the City of Cockburn or speak on behalf of the City of Cockburn
- Never disclose personal information about employees, residents, customers, members, visitors, or online followers, or proprietary or confidential information about the City of Cockburn or its business and/or government partners
- Avoid harassing, defamatory, or disparaging content and be sensitive to global cultures.

In observing the above, you acknowledge that internet content can live forever.



Q – I live in a suburb of the City of Cockburn and am an employee. A traffic management proposal is receiving negative feedback because other people are spreading inaccurate information. Can I leave a comment about their behaviour?

A – No because you would be representing the City on your personal social media channel. Instead, let your Communications and Marketing Business Partner know about the comments.



Protect what is ours

We care for all assets that make up the City of Cockburn. We also use them properly.

In protecting what is ours, The Cockburn Way means that we:

- Protect non-public information
- Protect organisational assets
- Acknowledge intellectual property rights
- Maintain accurate records.

Protect non-public information

The City of Cockburn considers any non-public information about the organisation as well as personal and/or sensitive information about our staff, ratepayers, residents, customers, members, suppliers, and other business partners that you may have (or access) as part of your job, to be confidential information. It can be written, spoken or electronic.

If you access confidential information while performing your job, The Cockburn Way means that you must:

- Only access, collect and use personal and commercial information that you need and are authorised to handle for legitimate business reasons
 - Disclose personal and commercial information only to authorised persons or suppliers who have a legitimate business reason to know the information and who are obligated to protect it. Securely store, transmit and destroy personal and commercial information in accordance with applicable policies and laws
 - Promptly report any actual or suspected violations of the City of Cockburn’s Information Security Policy and/or related policies, actual or potential data breaches, or other risks to personal information to People Leader or through best@cockburn.wa.gov.au.
- In observing the above, you also acknowledge that:
- Sharing non-public information with friends or family, or discussing it in public places such as elevators, public transport, cafes, restaurants, or on social media can put that information at risk of being disclosed (and possibly misused). Do your part to keep it safe
 - Your duty regarding non-public information applies to work you did before you came to the City of Cockburn and lasts beyond your employment with the City of Cockburn.



Q – My People Leader is busy. They asked me to log into a City of Cockburn system that has highly restricted information using their log in and password to retrieve some reports that I would not otherwise have access to. Is that okay?

A – No. It is against City of Cockburn policy to share passwords. Also, access to highly restricted information should be limited only to those who are authorised to have access. You should refuse the request and remind the senior leader that you do not have access to this system and this information due to its sensitivity. In instances where you would otherwise be authorised to access the information, steps should be taken to provide you with appropriate access without using the password of another user.

The Elected Member Communication Policy articulates communication protocols between Administration (staff) and Elected Members. You can find a copy with more details on ECM or by contacting the Governance team.



Protect organisational assets

The City of Cockburn relies on you to act as an owner when using organisational resources provided to you so that you can do your job. Organisational resources include the buildings we work in, the technology that connects us to others, the ideas we develop, the emails we exchange, the vehicles we use to do our jobs, the computers, and mobile devices we use to do our jobs. All of this and more are City of Cockburn assets that we entrust to you to use honestly, efficiently and to protect.

The Cockburn Way means:

- Observing good security practices with any asset that has been issued to you
- Doing your part to prevent misuse, unauthorised use, or access to our facilities
- Not using a City of Cockburn asset:
 - For an outside business or other personal gain
 - For anything illegal or unethical (such as access to, or dissemination of, pornographic or offensive subject matter) or to harass anyone
- Not lending, selling, or giving away any physical asset made available to you as part of your job unless authorised to do so.



Q – A People Leader asked for my help in organising a small silent auction for a fundraiser to benefit a charity they support which is not sponsored by the City of Cockburn. They will be inviting everyone from the team to attend, and they will be hosting it in one of the City’s conference spaces. Is this an appropriate use of City assets?

A – No. Even though well-intentioned, these actions would constitute a misuse of City of Cockburn assets. It might also be a violation of other City policies depending on your location. You should let this leader know that you cannot assist them in this capacity and inform them that their actions constitute a misuse of City assets.



Q – Our team did not utilise all our approved project budgets this year. To maintain this level of funding in the future, is it okay to ask a supplier to pre-bill us this year for one of next year’s projects, referencing a current-year purchase order?

A – No. Doing this would falsify expenses recorded in our books and records, misrepresenting the timing of actual spend. The law requires us to maintain accurate records and management relies on accurate financial records to steward the business and make decisions. This action would constitute a violation of our Code of Conduct.



Acknowledge intellectual property rights

Intellectual property includes City of Cockburn trademarks, brands, domain names, social media accounts, package designs, logos, copyrights, inventions, patents, and trade secrets. It is an invaluable asset built over many years and must always be protected.

Acknowledging intellectual property rights The Cockburn Way means:

- Never allowing a third party to use, or allow others to use, our trademarks or other intellectual property without proper authorisation and a license agreement that has been approved
- Never using, or allowing someone else to use our trademarks in a degrading, defamatory or otherwise offensive manner
- Acknowledging that as a City of Cockburn employee any work you create, in whole or in part, in connection with your duties, and/or using company time, resources or information, belongs to the City of Cockburn.

Maintain accurate records

The City of Cockburn generates a large volume of business records each day. You are responsible for ensuring that the records in your custody or control are maintained, retained, and destroyed in compliance with all legal and regulatory record keeping requirements.

Maintaining accurate records in The Cockburn Way means that you should:

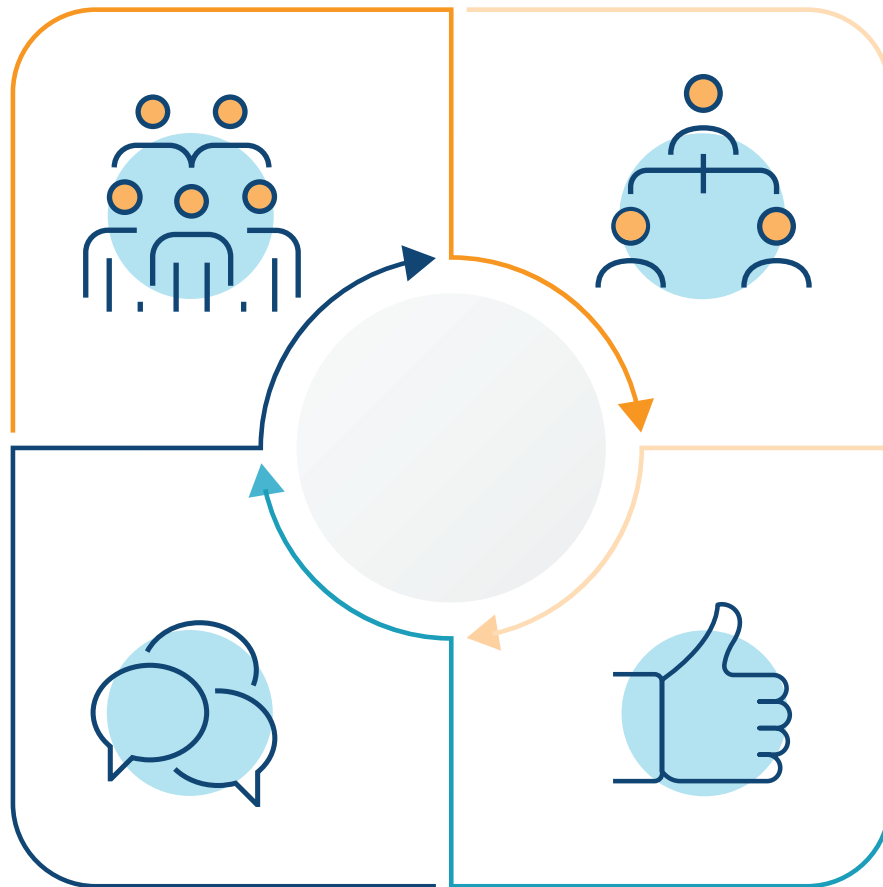
- Comply with our records management policies and retention schedules for all business records, paper or electronic.

In observing the above, you acknowledge that you are responsible for all business records you interact with in your daily work. Business records include any document or communication in paper or electronic form that is maintained during business, such as emails, project plans, purchase orders or contracts. If you, as part of your job, manage more highly regulated records, such as personnel files, market research, tax documents, or information with government agencies, you also acknowledge that you have an increased obligation to understand and adhere to all City of Cockburn related records management requirements.



Q – My People Leader has implied that I should reduce the number of hours I have recorded on my timesheet. I know I have been working more than the budgeted hours but I feel like I have worked as efficiently as possible. What should I do?

A – You must record your hours accurately as incurred. You should not reduce or inflate hours, and you should not sacrifice quality just to get the job done in the allotted hours. You should immediately discuss your concern with your People Leader. If they ignore your concern, you should discuss this with other appropriate resources, such as best@cockburn.wa.gov.au.



Part 2 – Additional details



Who does the Code cover?

It does not matter where you work or what you do for the City of Cockburn – you have a responsibility to use good judgment and follow our Code. That includes every full time, part time or casual employee at every level of the City of Cockburn, all the way up to ExCo. All employees, and any others subject to the Code, must acknowledge that they have read and agree to uphold the Code.

Anyone who works on the City's behalf (including suppliers, consultants, and other business partners) must share our commitment to integrity by following the principles of our Code when providing goods and services to the City of Cockburn or acting on our behalf. Suppliers, as a condition of working with us, must comply with our Statement of Business Ethics and our Procurement Guiding Principles.

Your rights as an employee

While we expect you to follow our Code, we also recognise your rights as a City of Cockburn employee. Nothing in this Code or in any City of Cockburn policy is intended to limit or interfere with your rights under the law.



What is everyone's personal responsibility?

Act with integrity and follow our Code

The City of Cockburn's reputation for acting ethically and responsibly is built one decision at a time, every day, by each of us. Our Code, together with our organisational policies, gives you the information needed to perform your job ethically.

We can act with integrity by:

- Respecting and following our Code
- Treating every action, you take, as a vote in the person you want to be
- Always doing what is right
- Leading by example, regardless of role, and empowering people to deliver
- Behaving in an authentic and transparent way
- Being accountable for our actions.

Watch out for ethical shortcuts

At the City of Cockburn, we pride ourselves on never allowing the pursuit of ambitious business goals to cause any of us to lose sight of the ethical aspects of decision-making.

Part of acting with integrity means doing the right thing even when no one is looking. It is easy to be tempted by small ethical shortcuts that others would be unlikely to notice.

If you are an employee – know and live the Code

As employees, each of us has as a responsibility to:

- Read the Code and know it
- Think before you act
- Use good judgment, being honest and ethical in every action you take. If you are asked to violate the Code, do not do it. Report the concern as soon as possible using the resources available to you
- Follow the law. Understand laws that apply to your job and our business. If you are ever unclear about a law or regulation, contact the Governance Team
- Ask for help. When an answer is not clear, ask for guidance before acting
- Stay alert. Pay close attention to any activity that is inconsistent with our Code, our policies, or the law
- Report concerns. Do not ignore a violation. Prevent harm to our organisation and its reputation by reporting your concerns immediately.

If you are a leader – lead by example

While all employees must always act with integrity, each leader at the City of Cockburn has the increased responsibility to lead by example and to empower others to deliver by reinforcing the principles of our Code throughout all levels of our workforce.

If you are a leader, you are expected to serve as a positive role model and inspire others to embrace our Code by:

- Rewarding integrity
- Encouraging ethical decision-making
- Facilitating collaboration and innovative thinking
- Creating an open work environment where team members feel comfortable to voice opinions fearlessly
- Preventing retaliation against those who speak up
- Seeking help in resolving and escalating issues when they arise.



How to make the BEST decision

Doing what is right is our goal

If the right thing to do is not clear, ask yourself:

- Is it consistent with our Code?
- Is it legal?
- Does it follow our policies?
- Does it benefit the City of Cockburn as a whole – not just a certain individual or group
- Would I be comfortable if my actions were made public (front page of the paper)?
- Would it pass the ‘pub test’ (would the general public support your conduct)?

If you can answer ‘YES’ to all these questions, the action is okay. But any ‘no’ or even ‘maybe’ answers are a signal to stop and get advice or ask questions. After all, it is always better to ask before you act, especially when you are not sure. Contact any of these resources for advice:

- Your People Leader
- Your People Experience Business Partner
- best@cockburn.wa.gov.au.



Q – What should I do if I am asked to perform a task that I believe might violate our Code of Conduct or a law?

A – Raise your concerns openly and honestly with your People/Senior Leader. If you are not satisfied with their response, or if you feel uncomfortable speaking to them about this, raise the issue with your People Experience Business Partner. You should never knowingly violate our Code of Conduct, a policy, or a law, even if directed to do so or because you failed to ask for guidance.



Reporting a Concern

We are all equally responsible for the version of The Cockburn Way that we create. We aspire to a workplace that incorporates the BEST principles. These characteristics become harder to aspire to when people ignore or avoid the kind of behaviour that does not represent the aspirations of this Code.

How do I share Concerns?

A Concern is anything that is happening at work that you sense is not right. A Concern can be something that you have seen or heard about that may breach our Code, our policies, or the law.

It is important to acknowledge that all of us have a responsibility to share a Concern, by reporting them as soon as possible – even if there is uncertainty that a Code breach has occurred.

Before sharing a Concern:

- a. For counselling and advice, you can contact:
 - Need Help?
Ethi-call is a free independent helpline.
Ethi-call provides expert and impartial guidance to assist you in finding the best way forward. To book an appointment visit ethics.org.au
 - Employee Assistance Program Counselling.

- b. If you feel comfortable, you can speak with:
 - Your People Leader
 - A People Experience Business Partner.
- c. Depending on the situation, you can reflect on the circumstances and:
 - Talk with the person or people involved to seek to understand the situation and to constructively resolve the matter
 - Constructively communicating your boundaries early is an effective way of setting expectations from the outset and can help stop issues escalating.

Note: The Cockburn Way is seeking help to guide you with these conversations.

Sharing your Concern:

- a. Notwithstanding the above, for a Concern to be official it must be reported via an email to best@cockburn.wa.gov.au
- b. A hard-copy, written submission can also be provided to Lead Culture and Transformation.



Providing as much information up front as possible

When sharing your Concern, we want to ensure that it can be understood and assessed efficiently. This means supplying matter of fact, clearly understood details on:

- a. The Concern itself – who was involved (including any witnesses), when and where it occurred, the part(s) of the Code that are relevant, the impact it had on you (how did it make you feel), any relevant supporting evidence.
- b. What occurred in the lead up to the Concern.
- c. What happened afterwards – including what you have done and who you have spoken to about the issue.

The more detail you provide, the more it helps us understand what occurred.

Help can be sought from either a People Experience Business Partner or the grievance support team at best@cockburn.wa.gov.au

What happens when a Concern is reported?

Concerns that are reported are documented, assessed, and then actioned.

Documenting a Concern

- a. By using the email address provided, a Concern will automatically be documented.
- b. The Lead Transformation and Culture and a People Experience Business Partner will review the application and endorse it for assessment. If not endorsed, the person submitting the Concern is asked for more information.

Assessing a Concern

- a. An assessment team comprising Manager People Experience, Senior People Experience Partner, Manager Transformation and Lead Transformation and Culture assess concerns as they are received.
- b. A Concern can be rated as being low, medium, or high risk.
- c. The person submitting the Concern is notified when an assessment has been completed, the rating the Concern received and what happens next.

Actioning a Concern

- a. We take every report seriously. Each report will be allocated a responsible officer who will be tasked with closing out the Concern Report. People Leaders and where necessary the relevant Head will be notified and engaged.
- b. We expect everyone listed as being involved in a report to cooperate fully and honestly with the responsible officer.
- c. There is scope, as part of an investigation:
 - to request additional information and/or evidence
 - to upgrade or downgrade the original Concern rating.
- d. Outcomes of investigations are presented to the relevant officers subject to the Concern rating, who will determine, based on the investigatory facts presented, if there has been a breach of the Code.
- e. If the relevant officers subject to the Concern rating determine that the Code has been breached, they will determine a fair and consistent disciplinary action in accordance with applicable law.
- f. Those found to have breached the Code can seek reconsideration.



No retaliation

You are the eyes and ears of our organisation, and we value your help in avoiding and uncovering misconduct. We prohibit retaliation of any kind against anyone who shares a good-faith concern or participates in a Code investigation. Sharing a good-faith concern about the Code honestly, even if it turns out to be unfounded, is never an excuse for any kind of retaliation.

What is retaliation?

We define retaliation under our Code as any action that would deter someone from reporting a Code concern or participating in a Code investigation. Examples of retaliation might include demotion, firing, a reduced salary, job reassignment, threats, harassment, or any other action taken against someone because they raised a Code concern, participated in a Code investigation, or attempted to deter someone from violating the Code. While we take the anti-retaliation provisions of our Code very seriously, these provisions do not protect you from disciplinary action for your own misconduct, meaning you should not report a Code concern simply to avoid discipline for your own violation of the Code or other organisation policy.

No false accusations

As much as we encourage honest reporting, we do not tolerate knowingly false reports. Making a false accusation or vexatious complaint can divert investigatory resources away from credible good-faith concerns and damage morale. Report what you have a reasonable, good-faith belief to be true, but never knowingly make a false accusation, lie to investigators, or refuse to cooperate in an investigation, as these actions may also violate our Code. In addition, making vexatious complaints with the sole aim of causing disruption and inconvenience will also not be tolerated.



Part 3 – Administering and establishing the Code



Administering the Code

The Code is endorsed by the Executive Committee comprising of the Chief Executive Officer, Chiefs and Executives.

It is administered by Executive People Experience and Transformation, specifically the Transformation Service Unit.

Administering the Code involves managing the internal communications around the document, ensuring people are aware of the document especially people being onboarded, maintaining relevant data around the Code, and managing regular reviews of the document.



Establishing the Code

The *Local Government Act 1995* (LG Act) requires all local governments to prepare or adopt a Code of Conduct to be observed by Elected Members, committee members and employees. This document is established under the Act as a Code of Conduct for employees.



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