



City of Cockburn Employee Code of Conduct

The Cockburn Way





Message from the CEO

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. We are all here as public servants for the Cockburn community. The Cockburn Way helps guide us to a high standard of public service to the community.

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 Leadership Team (aka ELT) 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 us all – 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. We work as One Team, One System, One Culture.

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

The Code of Conduct guides us in how to perform our roles, informs the way we conduct ourselves for the City, and sets clear expectations of one another as required under local government legislation. 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 – Benevolent, Empathetic, Safe, Trustworthy, or 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 and 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 project. You may find they will share more details with you, that you may not have known earlier. 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.



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 often will not share their insights. 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.”

Brené 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 non-judgmental
- 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. I do not mind the recent changes and want to tell them to move on.

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 pain.



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.

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, try again and if we fail, circle back, clean it up, and try again – all so we can have the BEST place to work in.



Safe – Psychological and Physical

“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 apprentice mechanic in the workshop notices that delays in receiving critical vehicle parts are causing shortcuts in repairs. As a result, fleet vehicles are returning with unresolved issues, potentially compromising safety. The apprentice raises their concerns with management, but their input is brushed aside, and the issues begin to compound.

These two scenarios provide an insight into how varied the impacts of a lack of psychological safety at work can be. 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.

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 curly question, feeling safe to own up to mistakes or sharing concerns before something develops into a problem.

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



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.



As a People Leader, the Cockburn Way of enabling a psychologically safe environment looks like you:

- Acknowledging that you are okay with a psychologically safe approach might mean work takes a little longer to complete, as teams pause to evaluate or invite other perspectives
- Being mindful 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, the Cockburn Way psychologically safe environment looks like people:

- 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. Accepting that team members 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.



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 Culture 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.



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, Pixar

Transformation and innovation offer opportunities to re-consider what we have always done 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 a lot like:

- Being curious about the organisation and your subject matter
- Being ready to challenge the status quo when latest information suggests that there is an opportunity to be leveraged. Asking ‘why not’ is encouraged rather than discouraged
- Sharing information early and often
- Knowing when to consider options and knowing when to move quickly to test an idea. We are comfortable with experimenting
- Being comfortable with mistakes made with the right intent
- Teamwork rather than a one-person show.

Physical safety

The mechanic scenario mentioned above provides 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 needing ongoing diligence. Diligence is defined as careful and persistent work or 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 for ourselves and others
- Do not abuse substances
- Are anti-violence
- Are anti-harassment
- Are anti-discrimination
- Are anti-bullying.

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

Act and work safely

At the City, 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 you or the environment is assigned to you
 - A job you think you are not trained to perform is assigned to you that may harm you, others or the environment
 - 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, 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 or certain legal substances or misused prescription medication.

The Cockburn Way means that you must perform your job 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 premises
- Attending work premises after consuming alcohol or drugs
- 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 (except a designated function authorised by the CEO) or at work related meetings with Councillors is prohibited.

The City understands that substance abuse and addiction may be a symptom of another health or social issue including trauma, overwhelm, domestic violence, isolation, relationship issues and mental illness. The City will seek to support employees who are actively engaged with addressing underlying issues.

Anti-violence

There is a zero-tolerance for workplace violence at the City. 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 parking areas as well as our facilities, to the full extent permitted by local law.

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

In observing the above, you are also acknowledging that workplace violence also includes any violent act by a third party against a City employee who is conducting business on behalf of the City. You have an obligation to speak up and report unusual or concerning behaviour, threats, or potential violence immediately to your supervisor or People Experience team. Violent incidents will be referred to Western Australia Police.

Seeking assistance with substance abuse, misuse, and addiction

If you have a drug or alcohol problem, you are encouraged to seek assistance. Contact the City's confidential Employee Assistance Program for support or reach out to the WA Alcohol and Drug Support Line 24/7 on 9442 5000.



Anti-harassment/Anti-discrimination

There is a zero-tolerance for workplace harassment/discrimination at the City. 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 harass someone, or make comments about them, based on differentiating them in regard to their 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.

Anti-bullying

At the City we are committed to providing a work environment where employees are treated inclusively and respectfully. Bullying refers to repeated instances of unreasonable behaviour directed to a worker or group of workers that is victimising, humiliating intimidating or threatening. We are committed to ensuring a workplace free of bullying conduct.

The Cockburn Way means you must:

- Never engage in workplace harassment or bullying, 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
- Not engage in the spread of malicious rumours, gossip, speculation or misinformation
- Make sure you do not sabotage a colleagues work through the withholding of information, constantly changing targets or by hiding documents or equipment needed to effectively perform their duties
- Never make inappropriate comments about a worker's appearance, family or lifestyle
- Not deliberately excluding people from meetings or activities
- Provide reasonable expectations for employees, and not overload people with too much work or unreasonable deadlines

- Provide feedback in good faith, and never insult or unjustly criticise colleagues
- Not isolate or ignore any worker
- Not tease or threaten employees
- Conduct yourself without yelling, screaming, or intimidating fellow employees
- Never use loud, abusive, or offensive language or comments
- Not set tasks that are far in excess of, or far below than an employee's level of skill.

If you see these types of behaviours occurring, we encourage you to respectfully intervene on the behaviour, or to reach out to your People Experience Business Partner for support and guidance. Everyone has a responsibility to provide a safe and fair environment for work.

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.



You have an obligation under the law and as an employee of the City to ensure you do not sexually harass anyone. As leaders, you have a positive duty to demonstrate how you are providing employees a safe workplace free from sexual harassment. This behaviour can be obvious or subtle, once off or a pattern of behaviour. The intention of an alleged harasser is not relevant. Even if an alleged harasser has no sexual interest in the person harassed, or felt they were not acting in a sexual manner, the conduct may still be deemed sexual in nature.



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. Social gatherings authorised through work would still be ‘at work’, meaning Sexual harassment workplace laws still apply. 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. For additional support, or if you are uncomfortable addressing the behaviour in the moment, reach out to your People Experience Business Partner so that additional steps may be taken consistent with established processes.

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, including the use of emojis with sexual connotations
- Explicit or degrading comments about appearance, leering or staring
- Display of sexually suggestive pictures or pornography
- Inappropriate physical contact, including unwelcome touching, hugging, cornering or kissing
- Pressure or requests for sex or sex acts, or actual attempted rape or sexual assault.



Q – I have been at the City 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 of your family circumstances. 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.



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.

Public interest

“In the long run, the public interest depends on private virtue.”
James Q. Wilson

The Cockburn Way requires us to have the public interest at the heart of everything we do.

We must approach our work with clarity and restrain ourselves in the pursuit of what is right. This focus on the public interest means that we will get the outcomes that are best for the community, not just in what is being done, but in how it is being done.

The public interest requires us to always put the interests of the City above our own. Where there is a conflict between our interests and the City’s interests, we act quickly to manage that conflict. Working in the public interest requires us to manage public funds responsibly by being cautious in our dealings and prudent in our spending.

The City is a democratic organisation. We must honour the choices of our leaders by the community. This includes honouring the rights of freedom of choice, access to government services and information, freedom of speech, freedom from discrimination, privacy and democratic participation.

We do our job

When you work for the City, 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.

This also includes honouring the responsibilities of government to uphold the law, serve the people, protect the environment, safely steward government resources and be open, transparent and accountable.

Acting in the public interest is to act in the common good for the community.

The Cockburn way means we:

- Ensure transparency and accountability, to promote public understanding and to safeguard the local government democratic process
- Enact good decision-making
- Uphold high standards of integrity
- Ensure justice and fair treatment for all
- Secure the best use of the public resources entrusted to us.



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, we provide an environment of dignity and respect for all people, while simultaneously promoting the safety and inclusion of vulnerable people. Being able to recognise vulnerability in its various forms is the first step towards being able to support and protect vulnerable people.

What is a vulnerable person or group of people?

While all people must be protected from harm, there are additional legislative and ethical considerations for protecting vulnerable people.

Vulnerable people can include:

- Children and seniors
- People with impaired intellectual or physical functioning
- People from a low socio-economic background
- First Nations peoples
- People who are not native speakers of the local language
- People with low levels of literacy or education
- People subject to modern slavery, which involves human exploitation and control, such as forced labour, debt bondage, human trafficking, and child labour.

Vulnerable people are not limited to the users of the City's services, they can include staff, volunteers, reference group members, student placements and people in third parties, such as suppliers and partners.

For more information see The Australian Governments [Safeguarding vulnerable people toolkit](#).

The Cockburn Way means that you must:

- Act in a manner that treats all vulnerable people with dignity and respect and values their individuality and diversity
- Support the wellbeing of vulnerable people
- Act in a way that is respectful, kind and assists people to feel safe and supported
- Promote and protect the rights, interests, and wellbeing of vulnerable people
- Foster inclusion, active participation, fair opportunities, and supportive policies that promote the wellbeing and growth of vulnerable people
- When working with vulnerable groups comply with legislated requirements that may include; Working with Children Check, requirements maintaining an up-to-date Criminal History Check, disclosing issues deemed reportable and disclosing recent convictions including pending or current charges that relate to children and young people or vulnerable people, notifying your People Leader of any change in eligibility
- Comply with the City's Notifiable and Reportable Conduct Policy relating to children and young people in compliance with the [Reportable Conduct Scheme](#).



- Where a critical or reportable conduct incident takes place involving a young person who is a member of staff, a volunteer, a practicum student, client or customer, a Service Manager must be informed, and the child or young person's parents contacted.

In local government, reportable conduct refers to allegations of abuse or misconduct involving children that are mandated to be reported to the Ombudsman. This includes sexual offences, sexual misconduct, physical violence, and significant emotional or psychological harm to a child. Local governments are responsible for having procedures in place to handle and report these allegations. For more information on your obligations under the reportable conduct scheme see the [City's Notifiable and Reportable Conduct Policy](#).

As part of our commitment to vulnerable people, the City aims to understand and acknowledge the principles and foster an environment where all children and young people feel safe, respected, and appreciated.



Q – I have a team member who has an intellectual disability. He is known for his positive attitude and reliability when given clear instructions and support. I noticed another colleague interacting with the team member in a dismissive and demeaning manner, pressuring him to complete a task quickly, and using condescending language such as, “It’s not that hard, even you should get this,” and “Just do what you’re told.”

A – This behaviour may be considered bullying, if you feel comfortable, speak with your team member about why you feel their comments were not appropriate. You are also encouraged to speak with your People Experience Business Partner. Provide factual observations without assumptions or emotional judgement. Privately check in with your team member to show support, express concern, and encourage him to speak up.

National child-safe principles

Children and young people have the right to be safe, organisations have a responsibility to create and maintain safe environments. The 10 National Principles for Child Safe Organisations are based on the recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse, focusing on a proactive and preventative approach. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.

1. Child safety and wellbeing is embedded in organisational leadership, governance and culture.
2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
3. Families and communities are informed and involved in promoting child safety and wellbeing.
4. Equity is upheld and diverse needs respected in policy and practice.
5. People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
6. Processes to respond to complaints and concerns are child focused.



7. Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
8. Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
9. Implementation of the national child safe principles is regularly reviewed and improved.
10. Policies and procedures document how the organisation is safe for children and young people.

More information on the [National Principles for Child Safe Organisations](#).



Q – I noticed a visibly distressed 17-year-old in the foyer of the City’s Administration Centre. I asked them if they were okay and they explained that they had no safe place to sleep tonight.

A – Reassure the young person by thanking them for coming in and let them know they are in a safe place. Staff members should guide the young person into a private area and notify the Youth Services Lead of the situation. Youth Services staff will contact relevant services including the Department for Communities, Child Protection, if the young person discloses issues of harm or abuse. Medical or mental health services can also be notified if appropriate. Staff members should stay with the young person and remain in contact with the Youth Services Lead until further arrangements and supports are in place. Confidentiality, patience, empathy and compassion are essential in building trust and ensuring the young person’s safety.



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 discriminatory, and not in line with the Code. We want our teams to show up as their whole 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 in the moment, or believe this may occur again, or want to initiate a grievance, contact your People Experience Business Partner for guidance and support.



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 your People Experience Business Partner for guidance and support.

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
- Are not allowed inter-office relationships where there is a power imbalance (relationships between leaders and direct reports)
- Identify and manage conflicts of interest
- Are responsible with gifts, meals, and entertainment
- Are responsible with social media.

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
- Protect non-public information (see page 23)
- Conduct your relationships fairly, positively, and productively based on mutual respect and trust
- Disclose or refuse gifts offered in the course of your duties as required by law
- Effectively manage any conflict of interest or perceived conflict of interest
- Not offer or provide anything to anyone in exchange for an advantage for you or anyone else
- 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
- Make sure that we meet our contractual obligations if your work involves managing a contract
- Cooperate fully with any internal or external audit or review or any other assurance activity
- 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 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 – 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.



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 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.

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 improperly offer, directly or indirectly, something of value to anyone the City has dealings with
- Not make facilitating payments to government or elected officials
- Promptly report any suspected bribery, demands for a bribe, or payment of a bribe
- Promptly report any suspected blackmail, threats of potential blackmail, or 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 when performing your job. At the City, conflicts should be avoided, or an appearance of a conflict, between your personal interests and the City's interest.

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 laws relating to conflict of interest must be understood and followed.

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 to Legal and Compliance, especially when personal relationships, outside employment or investments are involved
- Declare any relationship that may, or be perceived to impact upon impartiality, to the CEO prior to presenting to Council
- Understand and follow the City's Conflict of Interest Guidelines and Policy.

The Cockburn Way, and the law, means that you must:

- Disclose both to your supervisor, and using the appropriate form, any conflict of interest that may arise in the performance of your duties
- Disclose to the Chief Executive Officer in a written notice prior, or to the Council or committee at the meeting, the nature of any interest the employee has in a matter to be discussed at the meeting
- Disclose to the Chief Executive Officer in a written notice prior to a Council or committee meeting, or at the time the advice is given, the nature of any interest the employee has in a matter on which the employee will give advice or has given advice
- Disclose to the Chief Executive Officer the nature of any interest in a matter that relates to a delegated power or duty held by the employee, and refrain from exercising that delegated power or duty.



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'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, or other organisations or groups that you are a part of
- Use City 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 influence that person's employment opportunities or compensation

- Have outside activities or employment that negatively affect your job performance or interferes with your City 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.

More details on disclosing conflicts of interest are contained at the end of the Code. The City's intranet provides a form and a process for disclosing conflicts of interest.



Q – I have learned that the City 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. 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, 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:
 - Less than \$50 in value
 - A token item like a pen, t-shirt, or logo branded item
 - Symbolic, like a modestly priced, inscribed trophy or statue
- Declaring all gifts valued between \$50 to \$300 using the [Gift Declaration form](#) found on the intranet
- Only accepting occasional, reasonably priced meals or entertainment if the giver also attends
- Not accepting a gift where it is considered prohibited under Local Government Regulations (1996), including gifts:
 - Given in exchange for some action
 - There is a perception of or an actual conflict of interest
 - Any value of cash or a cash equivalent, like a gift card or gift certificate
 - In the form of stocks or securities
 - Over \$300 in current market value
 - Not available to others, like a special discount
 - Any gifts in the period of one year that may add up to over \$300 in value for an individual employee
- 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, worth more than \$300. This supplier has worked for the City 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. Therefore, the gift must be returned, and your direct report notified.



Are responsible with gifts and hospitality

There are limited occasions when it will be appropriate to receive a gift or hospitality from people or organisations that the City does business with. There are also limited occasions when it will be appropriate to provide a gift or hospitality on behalf of the City.

The Cockburn Way, and the law, means there is a need to:

- Speak to your Director prior to accepting gifts or hospitality from people or organisations that the City does business with
- Be cautious in accepting gifts or hospitality from people or organisations that the City does business with
- Be cautiously prudent in providing hospitality to colleagues, elected members, community members and other stakeholders
- Be cautiously prudent in providing gifts in the limited circumstances when these are appropriate
- Disclose gifts received promptly as required by law
- Comply with the City's Civic Hospitality and Gifts Policy
- Refuse prohibited gifts as required by law.

More details on gifts are contained at the end of the Code. The City's intranet provides a form and a process for disclosing gifts received.

Are responsible with social media

At the City, 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.

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

- Understand and comply with the City'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 employee and/or are using City equipment or systems
- Do not misrepresent yourself or the City
- Do not speak on behalf of the City unless authorised
- Never disclose personal information about employees, residents, customers, members, visitors, or online followers, or proprietary or confidential information about the City 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 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 the Service Lead Communications and Marketing know about the comments.



Protect what is ours

We care for all assets that make us the City. 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 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's Information Security Policy and/or related policies, actual or potential data breaches, or other risks to personal information to your direct report 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 and lasts beyond your employment with the City.

The Elected Member Communication Policy articulates communication protocols between Administration (staff) and Elected Members.

You can find a copy with more details in ECM or by contacting the Governance team.



Privacy and information sharing

The City collects a significant amount of information. This includes information that may be personal or sensitive. To maintain the privacy of individuals the City has a duty to record and store information securely and share information.

The Cockburn Way means:

- Storing and recording personal, sensitive and confidential information in proper business systems
- Maintaining effective control over the proper use of personal, sensitive and confidential information
- Not accessing personal, sensitive or confidential information unless it is required to be accessed as part of a legitimate work purpose necessary in the normal course of duties

- Properly managing any data breaches including disclosing them to best@cockburn.wa.gov.au
- Sharing information with other government agencies under proper information sharing arrangements
- Using information for public benefit in accordance with the law.

The Privacy and Responsible Information Sharing Act, Freedom of Information Act, Local Government Act and other relevant legislation sets out the requirements for recording, securing, using and sharing information. See the City's Privacy Management and Information Breach policies for more information.



Q – My People Leader is busy. They asked me to log into a City 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 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.



Protect organisational assets

The City 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 assets that we are 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 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 that they support but which is not sponsored by the City. 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 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.

Acknowledge intellectual property rights

Intellectual property includes City 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 our trademarks in a degrading, defamatory or otherwise offensive manner
- Acknowledging that as a City 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.



Maintain accurate records

The City generates a large volume of business records each day. You are responsible for ensuring that the records in your custody or control are retained in ECM in accordance with the City's Records Management Policy, Information Governance Framework and associated guidelines. Officers must not personally destroy records but should liaise with the Information Management team who will coordinate authorised disposal.

Maintaining accurate records the Cockburn Way means that you should:

- Comply with our records management policies and procedures 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. A record is information recorded in any form that is created, received and maintained by an organisation while conducting its business activities and kept as evidence of such activity. If you, as part of your job, manage more highly regulated records, such as but not limited to personnel files, tax documents, or records relating to children, you also acknowledge that you have an increased obligation to understand and adhere to all City related records management requirements.



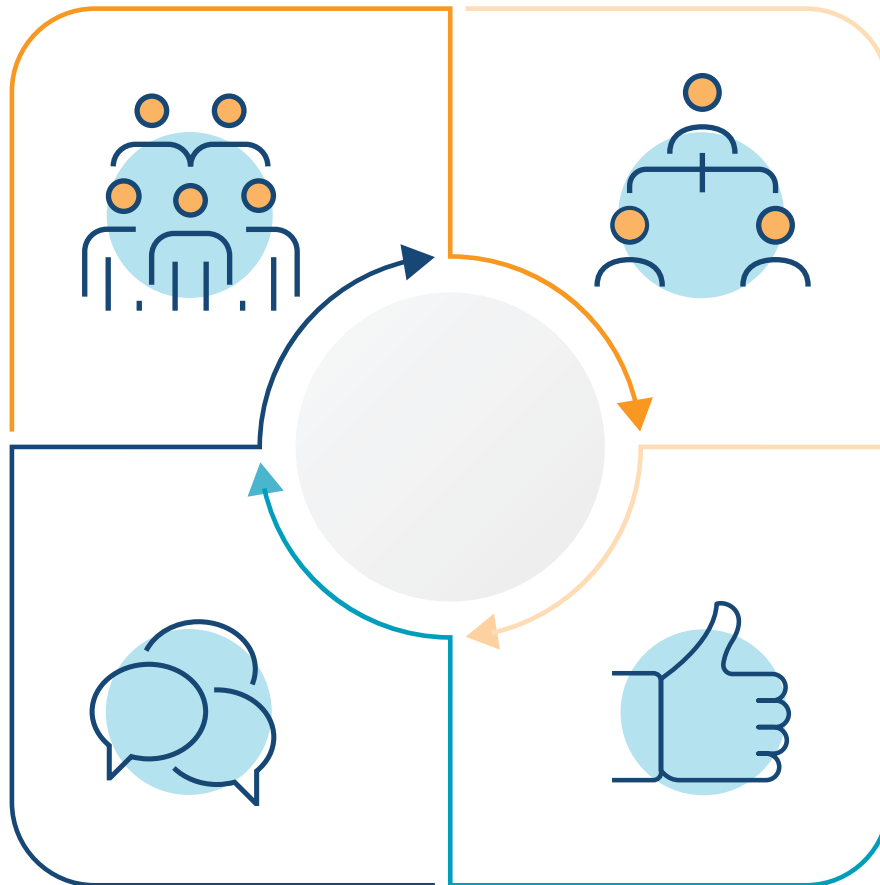
Q – Our team did not use all our approved project budgets this year. To maintain this level of funding in the future, is it okay to ask a supplier to pre-bill us this year for one of next year's projects, referencing a current-year purchase order?

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.



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 with your People Experience Business Partner or seek advice from 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 – 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, all the way up to the Executive Committee. 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 organisation's behalf (including suppliers, volunteers, 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 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 employee. Nothing in this Code or in any City policy is intended to limit or interfere with your rights under the law.



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

A – Raise your concerns openly and honestly with your People 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, a policy, or a law, even if directed to do so or because you failed to ask for guidance.



What is everyone's personal responsibility?

Act with integrity and follow our Code.

The City'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, 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 believe someone has broken the law, go directly to the Service Manager People Experience for support and guidance.

If you are a leader – lead by example

While all employees must always act with integrity, each leader at the City 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 this decision BENEVOLENT – Is it being made with the public interest at heart?
- Is this decision EMPATHETIC – Does it consider the perspectives of everyone who will be affected?
- Is this decision SAFE – Will it ensure that we look after the health, safety and wellbeing of everyone involved?
- Is this decision TRUSTWORTHY – Does it build trust in what we do by complying with the law, policies and community standards of what is expected?

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



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 benevolence, empathy, safety, and trust. 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

- For counselling and advice, you can talk with or contact:
 - [Ethi-Call](#) is a free decision-making helpline run by an independent third party, is available 24/7 and allows you to remain anonymous, where permitted by law. You may either call or report online. Translation services are also available
 - Employee Assistance Program Coaching

- If you feel comfortable, you can speak with:
 - Your direct leader
 - A People Experience Business Partner
- 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, with the above, part of 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 the Culture and Employee Engagement Specialist.



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:

- 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
- What occurred in the lead up to the concern
- 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 Organisational Capability and Performance team via 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

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

Assessing a concern

- An assessment team comprising the Service Manager People Experience, People Experience Specialist, and the Culture and Employee Engagement Specialist assess concerns as they are received
- A concern can be rated as being low, medium, or high risk
- 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

- We take every report seriously. Each report will be allocated a responsible officer who will be tasked with closing out the Concern Report. Direct reports and where necessary relevant People Leader and Group Manager will be notified and engaged
- We expect everyone listed as being involved in a report to cooperate fully and honestly with the responsible officer
- There is scope, as part of an investigation:
 - To request additional information and/or evidence
 - To upgrade or downgrade the original concern rating.
- 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
- 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
- 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 City 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 – Code compliance



Administering the Code

The Code is endorsed by the Executive Leadership Team comprising the Chief Executive Officer and Executives.

It is administered by the Director Corporate and System Services.

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.



Local Government Act Compliance

The Local Government Act 1995 requires all local governments to prepare or adopt a Code of Conduct to be observed by employees. This document is established under the Act as a Code of Conduct for employees.

The following information is explained in the Code above. This information is the full text of what is required by law to be included in the Code of Conduct.

Gifts and hospitality

Employees of the City must not receive prohibited gifts from any persons associated with the City.

‘Prohibited gifts’ refers to any gift worth \$300 or more, or receiving several gifts from the same person or company within a 12-month period that is worth more than \$300 in total.

Any ‘persons associated’ are people, groups or organisations who are either:

- Undertaking, or seeking to undertake, a business dealing with the City or any other activity requiring the City to exercise its discretion
- It is reasonable to believe, is intending to undertake a business dealing with the City or any other activity requiring the City to exercise its discretion



Employees of the City may be able to accept a gift if it is not a prohibited gift. The City asks all workers to carefully consider the appropriateness of accepting any gifts. For a gift worth less than \$50, such as a keyring, pen or chocolates, there is no requirement for this to be reported. For a gift worth between \$50 and \$300, workers are required to notify the CEO of the details of the gift within 10 days of the acceptance of the gift. Details on how to report a notifiable gift, can be found on the gifts disclosure form which you can obtain from the intranet, or by asking your People Leader.

Gifts disclosures will be recorded and stored in the City's record keeping system. The City may disclose or use this information as required by law, to ensure employees are acting in the public interest, for integrity analysis or to respond to an internal or external auditor or a State or Federal Government agency.

Disclosure of interest at Council or Committee meeting

- a) Means an interest that could, or could reasonably be perceived to, adversely affect the impartiality of the person having the interest
- b) Includes an interest arising from kinship, friendship or membership of an association.

Where an employee has an interest in any matter to be discussed at a Council or committee meeting, at which they will be present, they must disclose the nature of the interest, either in written notice to the CEO before the meeting or immediately before the matter is discussed at the meeting.

Alternatively, if an employee has given, or intends to give advice regarding any matter to be discussed at a Council meeting committee meeting, at which they will not be present, they must disclose the nature of any interest they may have in writing to the CEO before the meeting or at the time the advice is given.

The written notice that is given to the CEO will then be passed onto the person presiding over the meeting. This person must bring the notice and its contents to the attention of the persons present, immediately before the matter to which the disclosure is related, is discussed.

The disclosure must also be recorded in the meeting minutes.

Employees may be excused from a requirement to disclose an interest if they failed to disclose the interest and if the employee did not know, and could not reasonably be expected to know, they had an interest in the matter.

Employees may also be excused if they failed to disclose an interest in a matter if they were unaware that the matter in which they had interest was to be discussed at a designated meeting but then disclosed the interest as soon as possible after the discussion began.

These disclosure requirements are in addition to an employee's requirement to disclose direct or indirect financial, property and other interests under the Act and regulations.



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